Energy for generations

ESB Group Property

Issues Stage - Galway County Development Plan 2022 - 2028

Submission on behalf of ESB to the Galway County Development Plan 2022 – 2028 Issues Paper.
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1. INTRODUCTION

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to the Galway County Development Plan 2022 – 2028. ESB is a landowner and employer in Galway 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 broadly supports the vison included in Pre-Draft County Development Plan Issues Paper. Outlined below are observations regarding strategic issues that should be taken into consideration in the preparation of the Draft Galway County Development Plan 2022 - 2028.

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.

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 Northern & Western Region.

1.2 Transmission & Distribution

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 Galway 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 on 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 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 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, 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 2020.

2. PLANNING POLICY & PROPOSED DRAFT CDP

In reviewing the Issues Paper, 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 County Development Plan 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 County Development Plan 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.

The draft 2030 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 2019. 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 welcome the recognition in the Issues Paper (*p.19 Infrastructure & Transport*) that;

> "*The provision and maintenance of high-quality service infrastructure is vital to attracting and retaining economic development and improving the quality of life in the County.*"

ESB supports a review of the County Development Plan which will include policies and objectives to support the delivery of energy infrastructure to meet future energy needs.

2.1 Generation, 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. The new County Development Plan 2022 – 2028 must continue to ensure that the long-term operational requirements of existing utilities are protected.

In this regard, we would welcome the continuance of the Energy Policy set out in Chapter 7 of the existing County Development Plan. Therein, it is recognised that due to the potential for significant quantity of generation from renewable sources in the County, new transmission infrastructure and upgrades to existing infrastructure will be required. This is set out in Policy ER 3, which includes the following supportive statement;

"…Promoting and supporting the provision of secure and efficient supply and storage including electricity, gas and renewable energy including wind, wave/tidal, solar, bio-energy and heat energy distribution..."

The Issues Paper highlights that Galway County Council is committed to playing its role in achieving a transition to a low carbon, climate resilient and environmentally sustainable economy. In this regard 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.

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.

To support generation, away from fossil fuels, to renewable generation technologies combined with the reinforcement of the electricity grid, the development plan should include policies and objectives that support infrastructural developments increasing renewable capacity or resilience of the transmission/distribution systems. 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, such as Policy Objective ER 1 & ER 2 in the existing plan, which state;

Objective ER 1
"Support the development and expansion of infrastructure for the generation, storage, transmission and distribution of electricity, renewable energy and other renewable energy proposals in suitable locations in County Galway."

Objective ER 2
"Facilitate the progression of and implement improvements to the existing networks and facilitate the development of new transmission infrastructure projects in accordance with EirGrid's Grid25…"

The Issues Paper highlights that the existing Wind Energy Strategy for County Galway will be replaced with a new Local Authority Renewable Energy Strategy (LARES). ESB welcome this review of policy and wish to highlight that, 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".* ESB respectfully request that the existing policies on windfarms set out in the current Plan and the proposed LARES, are aligned with the most up to date advice and guidance from the Department of Communications, Climate Action & Environment.

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.

2.2 Telecommunications

The existing County Development Plan recognises that telecommunications investment is essential to furthering the social and economic development of County Galway. 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 Issues Paper, where the Council highlights the importance of the telecommunications sector and its role in attracting inward investment.

Section 7.7 *Information and Communications Technology Policies and Objectives,* and associated Policies ICT 1 – ICT 4 and Objectives ICT1 – ICT 4 in the current Development Plan sets out the requirements for a proposal for planning permission for telecoms infrastructure. ESB supports the continuance of these Objectives and the view of Galway County Council that;

> *"Support and facilitate the delivery of high capacity ICT infrastructure, broadband networks and digital broadcasting in the County having regard to the Government Guidelines 'Telecommunications Antennae and Support Structures' 1996 (DoEHLG) and Circular Letter PL07/12 (including any updated/superseding documents) and where it can be demonstrated that the development will not have significant adverse effects on the environment including the integrity of the Natura 2000 network."*

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 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.

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.
- 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.

One of the Key Questions in the Issues Paper under the heading *Infrastructure and Transport,* queries if parking standards for new developments should reflect the need to reduce car dependency. ESB suggest that parking standards for new developments should include provision for electric charging infrastructure.

The existing Development Plan highlights the Councils' support for the Governments Electric Transport Programme under Section 5.2 *Land Use Integration and Sustainable Transportation Strategy Policies and Objectives*. Policy TI 3 – *Sustainable Travel Measure* confirms support for the Government's commitment to sustainable transport, including electric vehicles.

Further support for zero carbon emissions transportation systems are outlined under Objectives TI 1 & TI 2 of the existing plan, *Sustainable Transportation & Sustainable Travel Measures.* ESB also supports the continuation of these objectives, that include supportive statements, such as;

TI 1
"Support and facilitate any 'Smarter Travel' initiatives that will improve sustainable transportation within the County including public transport, electric and hybrid vehicles, car clubs, public bike schemes, park and ride/park and stride facilities, improved pedestrian and cycling facilities as appropriate."

TI 2 (C)
"Encourage the use of electric vehicles and bicycles, in line with Council and national policy."

TI 2 (E)
"Support the provision of suitable infrastructure to encourage an increase in the use of electric vehicles including the piloting of charging points on-street at key areas subject to the availability of resources and the provision of charging points in non-residential developments."

ESB welcome the continuance of the above policies, however, we respectfully suggest that an opportunity to further promote EV Charging Points exists if clear guidelines were also included in the Development Management Standards for Parking in the draft plan. This would further 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. 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 Draft County Development Plan includes the clear policies outlined in relation to:

- Supporting the delivery and continuation of a secure and resilient supply of energy that optimises the use of the renewable energy resources of the County to address climate change, support job creation and the move to a competitive low carbon Green Economy, while also protecting the environment and amenities of the county.

- Safeguarding existing strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.

- Protecting the County's future capacity for the development of electricity Transmission and Distribution infrastructure.

- 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, including 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,

[redacted]

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