



Energy for
generations

ESB Group Property

Issues Stage - Roscommon County Development Plan 2021-2027

Submission on behalf of ESB to the Roscommon County Development Plan Review
Strategic Issues Paper 2021-2027.
31/07/2020





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1. INTRODUCTION

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to the Roscommon County Development Plan 2021 – 2027. ESB is a landowner and employer in Roscommon 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 vision included in Pre-Draft County Development Issues Paper. Outlined below are observations regarding strategic issues that should be taken into consideration in the preparation of the Draft Roscommon 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.

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 Roscommon 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 additional 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 Ireland's 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, 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 & PROPOSED DRAFT CDP

In reviewing the Strategic Issues Paper document, 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.

We support the view set out on page 14 of the document – *Infrastructure, including Transport & Communications*, that states;

“The provision of adequate infrastructure is essential for the county to function, now and into the future.”

In addition, we welcome the commitment that Roscommon County Council will play its role in achieving a transition to a low carbon, climate resilient and environmentally sustainable economy. 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. ESB supports a review of the County Development Plan which will update 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 2021 – 2027 must continue to ensure that the long-term operational requirements of existing utilities are protected.

We welcome the continuance of the Energy Policy set out in Chapter 4 (Policies 4.53 – 4.63) of the existing County Development Plan and in particular, Policy 4.57 which states;

“Promote the maintenance and upgrade of electricity infrastructure throughout the county.”

And Policy 4.56 which states;

“Facilitate the provision of new high-voltage electricity infrastructure, where the development is required in order to facilitate the provision or retention of significant



economic or social infrastructure including high voltage transformer stations within County Roscommon subject to normal planning considerations...”

The Strategic Issues Paper highlights that Roscommon County Council is committed to playing its role in achieving a transition to a low carbon, climate resilient and environmentally sustainable economy. 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 4.53 in the existing plan, which states;

“Encourage the development of renewable energy sources such as wind, biomass and solar energy as well as energy conservation measures such as energy-efficient building design and servicing...”

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 (DCCA). The recently published Draft Revised Wind Energy Development Guidelines (2019) confirm the “preferred draft approach”. ESB respectfully request that the Wind & Other Natural Resource Energy Technology Policies set out in Chapter 3 of the current Plan (Policies 3.47 – 3.52) and the Development Management Standards for Wind Farms set out in the Roscommon Renewable Energy Strategy 2014 – 2020, 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 provision of high-quality telecommunications infrastructure is recognised by Roscommon County Council as critical to the development of a knowledge economy and will help attract inward investment in hi-tech, knowledge-based industries. As highlighted in the Strategic Issues Paper, there is a recognition that there must be a mechanism to improve virtual connectivity, in the form of telecommunications and broadband.

As set out in section 4.7.2 *Mobile Phone Network Development*, the current Development Plan shall have regard to the 1996 Telecommunications Antennae and Support Structures (1996) and any revisions. ESB encourages the updating of current Policies 4.64 – 4.71 to reflect the Department

Circular PL 07/12 – *Telecommunications Antennae & Support Structure Guidelines*. 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'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 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.

The existing Development Plan contains promoting policies in relation to EV infrastructure, Policy 4.62 states;

“Encourage the use of electrically operated cars and bicycles, in line with Council and National policy, non-residential developments shall provide facilities for battery operated cars to be recharged at a rate of 10% of the total car parking spaces (metered-fast charging 220-240V, 32A three phase, as appropriate.”

Therefore, ESB welcome the continuance of the above policy, along with the development management guidelines and standards in relation EV charging infrastructure set out in section 9.27 of the existing plan. Adherence to these objectives will facilitate growth in charge point infrastructure for it 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.

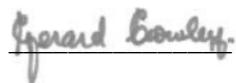
ESB, Ireland's leading electricity utility, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. Sustainability, both within the company and in the services we provide, is integral to our corporate strategy. We are committed 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:

- Backing 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.
- For the development of wind projects, ESB submit that development policies should be consistent with Government Guideline and the “*preferred approach*” as outlined by Government Departments, DHPCLG and DCCAE, in June 2017 and recently published Draft Guidelines.
- 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,



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