



Energy for
generations



ESB Group Property

Leitrim County Development Plan 2023-2029

Submission on behalf of ESB to the Leitrim County Development Plan 2023–2029
27/04/2022



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1. INTRODUCTION

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to the Draft Leitrim County Development Plan 2023 – 2029. ESB is a landowner and employer in Leitrim 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 Draft County Development Plan (CDP). However, outlined below are observations regarding strategic issues that should be taken into consideration in the preparation of the final CDP 2023 - 2029.

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. ESB operates a renewable energy portfolio that has the capacity to supply over 1,003 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 objective is to develop and connect renewables to decarbonise the electricity system by 2040. ESB's progress towards achieving carbon net-zero operations is consistent with the objectives of the National Planning Framework (NPF) and Regional Spatial & Economic Strategy (RSES) for the Northern and Western Region.

1.2 Generation, Transmission & Distribution

ESB owns and operates the Garvagh Glebe Wind Farm, located within the Corrie Mountains in Arigna, Co Leitrim, about 8km west of Drumkeeran village. The wind farm features 13 turbines with a combined generating capacity of 26 MW.

Mirroring Government objectives, by 2030 ESB will develop an additional 4 GW of new onshore and offshore wind and solar PV renewable assets to add to our 1 GW of renewables operating today. By 2030, 63% of our electricity will come from renewable sources and will be a net zero producer of electricity by 2040. ESB remains committed to completely transforming our generation portfolio, replacing old, inefficient plant with a mixture of renewables and high-efficiency gas capacity.

To support the transition of the National Grid to a low-carbon future ESB is developing assets such as battery storage and flexible gas fired units that respond quickly to system demand. These 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 Leitrim 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 2020 over 28,500 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 1,350 electric vehicle charge points across the island of Ireland. The Irish Government has set stretching targets for EV adoption in Ireland to address energy demand and emissions from transport. To help meet the 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.

ESB's plans also include investment in green hydrogen production, storage and generation facilities by the end of this decade. A clean, zero-carbon fuel, green hydrogen will be produced from renewable energy. This is fully aligned with the EU strategy launched in 2020 on energy sector integration which prioritises a more 'circular' energy system with energy efficiency at its core. Greater electrification using a renewable fuel like hydrogen for end-use applications where direct electrification is not feasible (e.g., heavy goods transport, high temperature industrial heat and zero carbon dispatchable electricity generation) will play a significant role in becoming carbon-neutral by 2050.

1.4 **ESB Telecoms & Telecommunications Infrastructure**

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

Our telecoms fibre network wrapped on our 110kV electricity network provides an extensive network throughout Ireland with international connectivity to the UK. In addition, SIRO (a joint venture between ESB and Vodafone) is bringing 100% fibre-to-the-building to 50 towns and cities across Ireland. SIRO will continue to accelerate this roll-out in 2022.

2. PLANNING POLICY & PROPOSED DRAFT CDP

ESB acknowledges that the process of preparing a new County Development Plan, as set out in overarching core strategy objectives, shall be informed by the hierarchy of national, and regional planning policy. This is reinforced through CS OBJ 1, that states:

CS OBJ 1

“To ensure that the future spatial development of Co. Leitrim is in accordance with the National Planning Framework 2040 including the population targets set out under the Implementation Roadmap, and the Regional Spatial and Economic Strategy for the Northern and Western Region 2020-2032.”

Chapter 2 of the Draft CDP sets out the Vision and Strategic Aims for the County. It highlights that the plan forms an important part of the County’s Climate Action Response, and the plan is mindful of the carbon emission reduction requirements set out in the Climate and Action Low Carbon Development (Amendment) Act 2021. ESB support for the implementation of Strategic Aim No. 13 (Chapter 2) and acknowledge that climate action provisions are integrated as a cross cutting theme throughout the plan. ESB is also working towards the delivery of Ireland’s target (part of the pledged EU target) of at least 55% reduction in domestic GHG emissions by 2030.

The Minister of Communications, Climate Action and Environment recently launched Climate Action Plan 2021. This plan commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050 and a reduction of 51% between 2018 and 2030. These targets are a key pillar of the Programme for Government. Among the most critical measures in the Government’s Climate Action Plan is that up to 80% of electricity will be generated by a mix of at least 5 GW offshore wind, up to 8 GW onshore wind and 1.5 - 2.5 GW from solar PV.

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. As recognised in Chapter 12 *Climate Action and Renewable Energy*, through the Renewable Energy Strategy (RES), and the related objectives of the Draft CDP, Leitrim County Council will support and facilitate renewable energy use and sustainable generation at appropriate locations within the County to meet national objectives towards achieving a low carbon economy by 2050. The RES outlines the strategy for renewable energy developments including wind farms, solar energy, bio-energy, hydroelectric power and renewable heat. The RES also outlines the strategy with regard to issues such as micro generation, micro hydroelectric power, renewable transport, energy storage and community energy.

In reviewing the Draft Plan, including the RES, ESB has a number of observations in relation to the key issues identified that may set the framework for delivery of energy infrastructure to meet energy needs and the future development of the County.

2.1 Electricity Generation, 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. Across the Draft CDP, but most particularly in Chapter 9, *Infrastructure & Energy*, Chapter 11 *Climate Action & Renewable Energy* and the RES, the Council recognises that the availability of energy is of critical importance to the continued development and expansion of employment in County Leitrim. In addition, the Council support the sustainable development of indigenous energy resources, with an emphasis on renewable energy supplies, in the interests of economic progress and the proper planning and sustainable development of the county. The development of secure and reliable electricity transmission infrastructure is also recognised as a key factor for supporting economic development and attracting investment to the County.



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. Therefore, we welcome supporting statements in the Draft Plan, that seek to reinforce the existing grid including grid connections, transboundary networks into the County and the expansion into areas not adequately serviced. The support for ongoing transmission projects is noted including the North West Project. ESB welcome support for energy utility providers to reinforce and strengthen existing utility infrastructure and transmission/distribution networks. In this regard, ESB support the continuance of Plan Polices ENI POL 3, ENI POL 4 and ENI OBJ 1 that include supportive statements such as:

ENI POL 3

“To support the renewal, reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects such as Renewable Integration Development Project.”

ENI POL 4

“To support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.”

ENI OBJ 1

“To safeguard existing strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.”

It is also acknowledged that significant parts of the county are designated under the Natura 2000 network and that the Council shall work in partnership with existing service providers to facilitate required enhancement and upgrading of existing infrastructure and networks (subject to appropriate environmental assessment and the planning process). In this regard, we note ENI POL3 and highlight that concerns about visual, amenity, health and safety need to be mitigated through the consultation process. The NPF, RSES and Local Development Plans and the Strategic Infrastructure Act provides the necessary framework for ensuring that all necessary standards are met and that extensive statutory and non-statutory consultation is an intrinsic part of the planning process. This ensures that there is ongoing consultation with local communities and local authorities regarding the construction of new networks.

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 generation, processing and transmission.

2.2 Generation & Renewables

In line with the Government’s response to the Climate Change Crisis, ESB is increasing renewables in our power system from 30% up to 80% by 2030 with a broader range of technologies likely to be deployed e.g., offshore wind, wave, solar etc. ESB welcomes broad support for the development of renewable energy technologies across the entire plan, including the very comprehensive RES.

In reviewing the Written Statement of the Draft CDP along with associated Appendices, ESB acknowledge the overall consistency and alignment with the objectives of the NPF, RSES and national guidelines. ESB wish to make some observations in relation to the renewable technologies and ancillary developments as set out below.

2.2.1 Onshore Wind

According to the SEAI *Energy in Ireland, 2021 Report*, 42% of all electricity generated in 2020 came from renewable sources, 86% of which came from wind, with the remaining 14% split evenly across hydroelectricity and bioenergy. This is an encouraging trend, but further acceleration of deployment is necessary to achieve the Government's target for electricity of up to 80% from renewables by 2030.

As mentioned above, among the existing wind farms in County Leitrim, ESB owns and operates the Garvagh Glebe Wind Farm, with 13 turbines with a combined generating capacity of 26 MW.

We acknowledge that the *Draft Revised Wind Energy Development Guidelines 2019 (DHPLG)* and the SEAI Methodology for Local Authority Renewable Energy Strategies (LARES) have been used to inform wind energy policy in the Draft Plan. ESB support a Plan led approach through the identification of areas for wind energy development. The Methodology set out in Appendix IX Parts A & B of the Draft Plan identifies the most suitable locations for wind energy development. The identified areas have been derived following a comprehensive sieve mapping analysis.

As an owner and operator of an existing wind farm in the County, ESB welcome the provision of supporting objectives for repowering of existing wind farms. Repowering can grant a new lease of life to existing renewable energy projects by extending the planning lifetime of existing windfarm with no, or minimal, new development. Well-maintained renewable energy projects and associated plant can operate safely after a planning expiry date of 20-30 years. Existing developments have the benefit of acceptance by local communities and contribute economically to the County through the payment of rates and community benefit funds.

2.2.2 Solar

Photovoltaic (PV) systems which produce electricity directly from solar radiation are becoming more widespread as their advantages become apparent and as costs fall. 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 expect to follow the trend of other European countries and see increasing deployment of rooftop and grid scale solar energy. There is a strong correlation between wind and changing weather systems. In times of low wind there are often good solar conditions.

In this regard, we welcome the support for the development of solar energy in the County as set out in the Draft Plan under Plan Policies SE POL 1-6. In the absence of national policy guidelines, the reinforcement of the above policies in the RES and through the Development Management Standards, 13.20.2 provides guidance to developers for the development of solar farms.

ESB wish to highlight that solar farms have potential to be built on agricultural land, whilst also accommodating the continued use of the land for grazing or for incorporating biodiversity measures within a project. We also wish to highlight that the overall guidance on solar developments could be strengthened with the provision for extension of duration of permission. Currently, Solar PV developments can take in excess of 5 years to develop to construction phase. Securing a grid connection, relevant support tariff or corporate power purchase agreement and securing project finance has introduced significant delays for developers. Therefore, notwithstanding the provisions of Section 42 of the Planning & Development Act 2000 (as amended), it may be more appropriate for the Planning Authority to retain the option to grant permission for a longer period if requested by the developer in appropriate circumstances.

In addition, the lifetime of solar developments is extending with most technologies now suitable for a minimum of 30 years operation. Investment decisions for projects are being made on project lifetimes of up to 40 years. In this regard, ESB request that permissions are granted with a lifetime up to a maximum of 40 years. Concerns regarding the deterioration of the infrastructure can be addressed by the lodgement of a financial security in the form of a bond and the requirement to provide a Decommissioning Plan, as specified. This will ensure that the development is maintained until decommissioned and appropriately restored to agricultural use.

2.2.3 Energy Storage

ESB note that the Draft Plan has considered emerging renewable energy storage technologies such as battery storage systems and other sources of renewable energy technology that are a viable means of providing energy security. This is highlighted in Chapter 12 of the Written Statement and also in Chapter 3 of the RES. Energy Storage Policy ES POL 1 states the following:

ES POL 1

“To promote the use of efficient energy storage systems and infrastructure that support energy efficiency and reusable energy system optimisation, subject to compliance with proper planning and environmental considerations.”

Energy Storage systems such as batteries, liquid air energy storage are some of the 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. Utility-scale battery storage systems are being utilised to enable more efficient use of renewable energy.

ESB is already installing Battery Energy Storage Systems (BESS) at existing facilities. BESS will operate by charging batteries using electricity and storing the energy until it is required. In addition, these batteries can stabilise the frequency of the electricity network further enabling the operation and stability of a highly renewable system.

ESB has partnered with dCarbonX on the assessment and development of Irish offshore green hydrogen subsurface storage. Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. This enables zero carbon backup to the power system when intermittent renewables such as wind and solar are not available. Large scale Green Hydrogen production and storage could leverage the continental scale of Ireland’s renewable energy potential to enhance Ireland’s energy security and to make Ireland a net exporter of energy.

2.3 Telecommunications

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

ESB supports the approach and the view of Leitrim County Council that to facilitate the provision of telecommunications services at appropriate locations within the County, the applicant must demonstrate compliance with national guidance. The Draft Plan recognises that applications for telecommunications development shall be consistent with the updated guidelines (PL 07/2012) that facilitate the improved development of telecommunications infrastructure and promotion of a policy of co-location.

The updated Guidelines facilitate the improved development of telecommunications infrastructure and promotion of a policy of co-location. 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. In addition, ESB Telecoms are working with ESB Networks to upgrade internal ESB Communications Networks to facilitate the roll-out of ESB's 'Smart Metering' project. The successful delivery of 'smart metering' is a central component of Ireland's plan to combat climate change through the reduction of unnecessary energy usage. Due to the extent and reach of the electricity network, additional masts may be required in some locations to ensure the delivery of 'smart metering' to all areas. ESB Telecoms will work within the development management standards to deliver this infrastructure.

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. ESB encourages policies consistent with the Department Circular to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.

2.4 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 2021 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.
- New scheme for 200 on-street public charge points per year for electric vehicles

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.

There are currently over 45,000 EVs registered on Irish roads, so while the number has improved, the pace of uptake must increase over the coming years to achieve our fleet electrification targets. The overall support for Electric Vehicles throughout the Draft Plan is acknowledged. Policies EV POL 1-3 and RES Policy T1.1 all seek to support the expansion of the EV charging network by increasing the provision of designated charging facilities. These promoting objectives are underpinned by the parking standards set in Chapter 13 *Development Management Standards*, section 13.16.10.

ESB welcome the above initiatives, however, it is very important to note that the EU Energy Performance of Buildings Directive calls for an **increase to 20%** for the number of parking spaces which should have provision for electric vehicle charging infrastructure. In preparing the final CDP, 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 Leitrim County Development Plan increases the usage of electric vehicles to the levels required, we request that the standards as set out in Statutory Instrument No. 393/2021 – European Union (Energy Performance of Buildings) Regulations 2021. The standards

in the table below are consistent with the above Regulation and should be considered for inclusion in section 16.16.10 EV Charging Points, in the Development Management Standards.

The standards below 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.

Development Category	EV Charging Points
Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces).	A minimum of 1 EV charge point space per five car parking spaces (ducting for every parking space shall also be provided)
New dwellings with in-curtilage car parking.	Installation of appropriate infrastructure to enable installation of recharging point for EV's.
Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g., office developments)	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV Charging Point.
Developments with publicly accessible spaces (e.g., supermarket car park, cinema etc.)	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV Charging Point.

Table 1. Proposed EV Charging Point Standards

2.4.1 Other Sustainable Transport

ESB also wish to highlight that, 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 and diesel HGV across Ireland.

In partnership with CIE and Bus Éireann, ESB was part of a new, in-service, trial of fuel cell electric buses powered by hydrogen produced from renewable electricity from ESB's Ardnacrusha hydro-electric power station. ESB has been actively engaging with Hydrogen Mobility Ireland (a partnership of businesses, public sector and academic stakeholders) to deliver a coordinated approach to this cutting-edge technology. This will ensure that Ireland can benefit from being an early starter in this solution to further decarbonise transport using renewable energy.

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 final County Development Plan includes clear policies in relation to:

- Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the associated Electricity Generation, Storage, Transmission and Distribution operations are strategic and national in nature.
- 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, 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.
- Good solar irradiation and significant grid network present opportunities to maximise energy generation by solar means. It is appropriate that permissions for Solar PV are granted with a lifetime up to a maximum of 40 years which reflects the operational life and financial modelling for current solar technologies.
- Promoting, encouraging and facilitating the use of sustainable modes and patterns of transport, including electric vehicles, to ensure the implementation of the latest standards consistent with S.I. No. 393/2021. This will support the extension of charge point infrastructure to ensure it becomes 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.

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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