Energy for generations

ESB Group Property

Draft South Dublin County Development Plan 2022-2028

Submission on behalf of ESB to the South Dublin Draft Development Plan
15/09/2021

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Contents

1. INTRODUCTION

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to the Draft South Dublin Development Plan 2022 – 2028. ESB is a significant employer in South Dublin 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 of the Draft Plan. As outlined in the Draft Plan, there continues to be significant advancement in renewables technology and outlined below are observations regarding strategic issues that should be taken into consideration in the preparation of the final 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 can deliver 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 goal is to reduce ESB's carbon emissions 40% by 2030 and move towards becoming carbon-neutral by 2050. Progressing 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 Eastern and Midland Region.

1.2 Generation, Transmission & Distribution

The Leixlip Hydro Electric Power Station is located in the north west of the County, on the boundary with Kildare Co. Co. and close to Leixlip Village. Leixlip Dam is the lowermost of ESB's dams on the River Liffey. The natural falls in the river have been developed for hydro power by the construction of dams and power stations at Poulaphouca, Golden Falls and Leixlip. A head of about 18m was developed at Leixlip between 1946 and 1949 by the construction of a dam and the installation of a 4 MW generator. Leixlip Dam has a dual remit enshrined in legislation in terms of hydroelectric generation and water supply to the Greater Dublin region.

It is our ambition that ESB will increase renewables to 50% of generation capacity by 2030, significantly contributing to the national target of 3.5GW of offshore wind, 8.3GW of onshore wind and 1.5GW of solar. We remain committed to completely transforming our generation portfolio, replacing old Plant with a mixture of renewables and high efficiency gas.

To support the transition of the electricity system to a low-carbon future, ESB is developing assets such as battery storage and flexible gas fired units at our existing generating sites that respond quickly to system demand, which 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 South County Dublin 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 1,100 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 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.

ESB's Plans include investment in a 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 direct electrification 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, the cement/oil industries etc. 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, including areas in South County Dublin and enabling speeds of 1 Gigabit per second. SIRO will continue to accelerate this roll-out in 2021.

2. PLANNING POLICY & PROPOSED DRAFT PLAN

ESB acknowledges that the process of preparing a new South Dublin Development Plan, as set out in Chapter 1 of the Draft Plan, shall be informed by the hierarchy of Planning policy in Ireland. This is confirmed in section 1.7 *Achieving the Vision* of the Draft Plan. In addition, each Chapter links the policy objectives of the Draft Plan to the objectives of both the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES), including the Dublin Metropolitan Area Strategic Plan (MASP).

The important role of the Development Plan in addressing Climate change is set out in the Strategic Objectives in Chapter 1, and it is recognised that it is addressed throughout the Plan as a cross cutting theme. 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 levels.

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. This aligns with Policy CA1 *Climate Action* in the Draft Plan, that stated ambition is to

> *"To support the implementation of International and National objectives on climate action including the Climate Action and Low Carbon Development Act 2015 (and any amending legislation), the 'Climate Action Plan 2019' (and any updated Plans) and ensure that South Dublin's Climate Change Action Plan and County Development Plan are aligned."*

ESB acknowledge, that in the last decade, the Council has adopted a proactive approach to addressing the climate change and energy challenge, particularly in the areas of energy planning and demand side management. In addition, the Council has been directly involved in a number of exciting initiatives, including the Tallaght District Heating project, that will use waste heat from a data centre in Tallaght to existing and new local authority buildings and the TU Dublin-Tallaght campus in the initial phase.

However, in reviewing the Draft Plan, 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 supports a new plan which will include policies and objectives to support the delivery of energy infrastructure to meet future energy needs.

2.1 Electricity 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 that will accommodate the ongoing generation, transmission and distribution of electricity. National Strategic Outcome 8 states

> *"Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewable focussed source of energy across the major demand centres."*

The Regional Policy Objectives (RPO) for the Region are outlined to ensure the development of energy networks in a safe and secure way to meet projected demand levels, to meet Government Policy, to ensure a long-term sustainable and competitive energy future for Ireland and enable energy service providers to deliver their statutory function. RPO 10.22 supports the reinforcement and strengthening of the electricity network to facilitate planned growth and transmission/distribution of a renewable energy focussed generation across the major demand centres.

We recognise that Chapter 10, *Energy,* is very strong on measures to reduce energy demand and Chapter 11 *Infrastructure,* focusses on high-quality infrastructure networks and environmental services, however, there is no reference to the reinforcement of existing energy networks or provision of new energy transmission and distribution infrastructure in the Draft Plan. The new Plan must ensure that the long-term operational requirements of existing utilities are protected. In this regard and to ensure consistency with National and Regional Policy we suggest the Draft Plan could be strengthen with the addition of a Policy Objective dealing with energy networks, that would include the text below.

> *"Support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers, ensuring the energy needs of future population and economic expansion across South Dublin and the wider Region can be delivered in a sustainable and timely manner."*

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 would support the introduction of a further objective that would provide support for existing transmission routes to be protected from inappropriate development and their scope for development maintained.

> *"Protect existing infrastructure and strategic route corridors for energy networks from encroachment by development that might compromise the performance of the 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 generating, processing, transmission and transportation infrastructure whilst encouraging the sustainable development of the County's renewable energy resources.

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. South Dublin has a very strong electrical grid and substation network and this network will be instrumental in supporting the development of energy initiatives in the county.

2.2 Generation & Renewables

In line with the Government's strategies to reach Ireland's 2030 reduced emissions targets ESB is increasing renewables in our power system from 30% to at least 70% with a broader range of technologies likely to be deployed e.g. offshore wind, solar, biomass etc.

ESB note the Council's support for the national policy shift to low carbon energy solutions for a greener future as outlined in the Vision set out at the beginning of Chapter 10, *Energy*.

> *"Deliver a green society and circular economy adaptable to new technologies, a home and place of employment for people and industries striving towards reducing their carbon footprint."*

In reviewing Chapter 10, *Energy,* ESB acknowledge the overall consistency and alignment with the objectives of the NPF, RSES and national guidelines and the ambition of South Dublin County Council to contribute to achieving national targets in consultation with local communities and businesses. This is reinforced through Policy E2, Objective 2.

> *"To promote the generation and supply of low carbon and renewable energy alternatives, having regard to the opportunities offered by the settlement hierarchy of the County and the built environment."*

We welcome the commitments set out in Chapter 10; to promote and support the development of a range of renewable energy resources in order for South Dublin to achieve its just transition to carbon emission reduction targets to 2030 and 2050.

> *"Overarching policy to promote energy conservation, increase energy efficiency and promote the growth of local based energy alternatives in an environmentally acceptable and sustainable manner in line with national and regional policy."*

ESB is developing assets that will support the grid to transition to a low-carbon future such as battery and energy storage assets and flexible gas fired units that respond quickly to system demand, which

will be key to facilitating large scale renewables in the future. Set out below are comments in relation to our existing facilities and these renewable technologies in the context of the Draft Plan and our Plans for electricity related development across Ireland.

2.2.1 Hydro Energy

Leixlip Hydro Electricity Station is a vital location for renewable power generation and water supply management for the region. The Station and Dam spans the South Dublin and Kildare Local Authority areas. The power station and dam at Leixlip is one of three hydroelectric stations that harness the river Liffey.

Dam safety is a major public safety issue and is ESB's most important priority in the management of its hydro facilities. ESB has categorised its dams in a similar manner to the Institution of Civil Engineers (UK) guide; *"Floods and Reservoir Safety"*, where dams are categorised based on the consequences of a breach. Being located on the River Liffey, upstream of densely populated areas, Leixlip Dam is a "Category A" dam, where a breach "could endanger lives in a community". To ensure the safety of its dams, including Leixlip Dam, ESB implements comprehensive dam safety procedures. In addition, the Health and Safety Authority (HSA) classify the site a permanent construction site. The Safety, Health and Welfare at Work (Construction) Regulations 2013 require that ESB, for construction sites under our control, have in place adequate measures to protect those who may be at risk from such a site. Areas in the curtilage of any power station plant are hazardous and Health & Safety legislation, in conjunction with a responsibility for the safety of the general public, requires that ESB restrict access to these locations. Therefore, the Power Station site at Leixlip is securely fenced around the perimeter and this clearly sets the extent of utilities land-use associated with the station.

These vital local and national activities require curtilage space to enable future consolidation and expansion. The station and its immediate surroundings are not a natural amenity, but an element of the civil engineering works constructed for the Generation, Transmission and Distribution of electricity and a potentially dangerous environment.

In this regard, we acknowledge that the lands on the South Dublin side of the Leixlip Station are zoned Objective HA (LV, DV, DM), *To protect and enhance the outstanding natural character and amenity of the Liffey Valley, Dodder Valley and Dublin Mountains*. However, access to the station lands should be discouraged in the interest of public safety. The need for curtilage management and for the restriction of land uses around the Leixlip Station is critical to maintain the ability for ESB consolidation and/or expansion as well as essential access, monitoring and maintenance of the Station.

2.2.2 Onshore Wind Energy

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 and as highlighted in section 10.27, Chapter 10 of the Draft Plan, the Council recognises the significant contribution that wind energy can make as a clean sustainable solution in order to reach Ireland's renewable energy requirements into the future.

We acknowledge that the updated Landscape Character Assessment (LCA) accompanying the plan, includes a Wind Energy Sensitivity and Capacity Analysis (completed in 2016) that determined that the metropolitan setting and the high value sensitivity of surrounding mountain areas severely limits the potential for economic wind farm development, without having

significant and overriding adverse visual environmental impacts on landscapes. We welcome the high-level wind energy potential assessment for the County carried out by Codema in 2020 and the intention of the Council to carry out a review of the Wind Energy Strategy for the County as set out on Policy E8, Objective 1.

> *"To review the current Wind Energy Strategy for the County during the lifetime of the Plan having regard to any updated Wind Energy Guidelines and the current South Dublin Wind Energy Strategy."*

In reviewing the current Wind Energy Strategy, we wish to highlight that assessing the County Development Plans and Wind Energy Strategies of adjoining counties would strengthen the Plan. It is noted that there is good consistency across County Development Plan's and the Wind Energy Strategies of some counties. However, there is scope to improve on this consistency further in order to facilitate the development of windfarms across county boundaries. Implementation of Regional Policy Objective (RPO 7.35 and RPO 7.36) of the RSES would help ensure consistency across the region. Unless this is achieved, a windfarm development on one side of border may not have scale to compete in future Renewable Electricity Support Scheme auctions and therefore may never get built – thereby reducing opportunity for both counties to benefit from jobs, rates and community benefit schemes associated with the windfarm development.

A Plan led approach, consistent with national guidance as committed to in the Draft Plan will enable South Dublin County to examine the potential with regard to wind energy developments.

2.2.3 Solar

No single renewable energy technology will deliver Ireland's transition to a low carbon economy but rather a diverse range of technologies will be required. It is predicted that solar will play a significant role in reducing greenhouse gas emissions and thus provide environmental benefits whilst also being complimentary to economic growth. Mapping for solar irradiation illustrates that South Dublin ranks well in terms of solar resource in Ireland. There has recently been a significant decrease in the cost of solar PV panels and this technology should offer possibilities for increased development of solar energy for electricity generation in the county.

We welcome the support for the development of solar photovoltaics and solar thermal use in the County as set out in the Draft Plan under Policy E7, *Solar Energy*.

> *"Promote the development of solar energy infrastructure in the County, including the building of integrated and commercial-scale solar projects subject to a viability assessment and environmental safeguards including the protection of natural or built heritage features, biodiversity and views and prospects."*

Objective CAF O27, *Renewable Energy Production* and section 8.5.3 *Solar Energy*. In the absence of national policy guidelines, Development Management Standards, Chapter 13, section 13.10.4, *Solar Photovoltaic,* presents the criteria by which applications for solar farms will be assessed.

Solar projects will play a critical role in diversifying our renewable generation portfolio for the period out to 2030. 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.

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.

2.2.4 Battery Storage & Hydrogen Energy

ESB note that the Draft Plan has considered emerging renewable energy technologies such as energy storage systems and other sources of renewable energy technology that are a viable means of providing energy security. This is specifically mentioned in the context of section 10.3 *Decarbonising Zones* and the Council's ambitions in this area.

Energy Storage systems such as batteries, liquid air and synchronous condensers 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 in order to enable more efficient use of renewable energy.

ESB are installing Battery Energy Storage Systems (BESS) at existing generating facilities across Ireland. BESS will operate by charging batteries using electricity exported from the national grid. When the stored energy is required, it can be released to stabilise the frequency of the electricity network or provide energy during periods of electricity shortages. We acknowledge that as highlighted in Chapter 12, *Our Neighbourhoods,* the Naas Road masterplan is examining Battery Storage as an opportunity for designing energy resilience into the area.

In addition, ESB wish to highlight, that 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.

We support the further consideration of the above technologies into policies in the final Plan and the wider encouragement of emerging and future renewable energy technologies.

2.2.5 Renewables-Enabling Plant

Notwithstanding the Government's aim to increase the percentage of electricity generation from renewables to 70% by 2030, the contribution from non-renewable sources will still consist of

30%. Furthermore, on dull still days or nights, almost all electricity may sometimes need to come from non-renewables generation.

We note that the requirement for renewables-enabling Plant is not acknowledged in the Draft Plan. Given that South County Dublin has access to Gas Network, the inclusion of the text below as a promotional Objective for the development of Renewable Enabling Plant will assist in the transition to a low carbon economy.

> *"It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand."*

ESB support this provision as it will be a necessary to connect additional non-renewable Plant to the grid. This efficient Plant can be applied rapidly to provide operational flexibility and the required grid support services, when needed. Typical Plant consists of fast-responding gas turbines (i.e. FlexGen Plant) to provide backup power and synchronous condensers to provide inertia & grid stability. FlexGen gas turbines need to be located close to existing 110kV or 220kV stations and the gas grid.

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Overall, 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 South County Dublin 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 South Dublin 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.

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.

We welcome the emphasis on co-location in IE5 Objective 4, as 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 national guidance 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 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.

ESB welcome the inclusion of supportive Objectives such as SM7 Objective 5 in Chapter 7 of the Draft Plan. Section 13.8.3, *Charging for Electric Vehicles (EV's),* in Chapter 13, *Implementation and Monitoring,* calls for EV charging points to be provided at a rate of 15-20%. ESB welcome the above initiative, 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 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 South Dublin 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 under 13.8.3 of the Draft Plan.

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 a recharging point for EVs
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

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.

2.4.1 Other Sustainable Transport

ESB acknowledge that South Dublin County Council has considered Renewable Energy in Transport throughout the Draft Plan. In this regard we 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, diesel HGV and potentially some diesel trains across Ireland.

ESB is currently part of a new, in-service, trial of a fuel cell electric bus in the Dublin area. These buses are 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) which is delivering a coordinated approach to the introduction of this new 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 retains 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. ESB request that specific Objectives, consistent with National & Regional Policy, supportive of the reinforcement of existing and provision of new energy infrastructure, along with the protection of strategic route corridors for energy networks be considered.

- We welcome the intention to review the current Wind Energy Strategy as 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.*

- The need for curtilage management and for the restriction of land uses around the Leixlip Station is critical to maintain the ability for ESB consolidation and/or expansion as well as essential access, monitoring and maintenance of the Station.

- South Dublin's location, coupled with a good solar irradiation and significant grid network, presents 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.

- The implementation of the latest standards consistent with S.I. No. 393/202. This will facilitate growth in 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,

[redacted]

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