

Senior Executive Officer,
Forward Planning Section,
Land use Planning & Transportation Department,
County Hall,
Tallaght,
Dublin 24.

26th April 2022

Re: South Dublin County Development Plan 2022-2028 – Proposed Material Alterations

Dear Sir/Madam,

This submission by Electricity Supply Board (ESB), 27 Lower Fitzwilliam Street, Dublin 2, is in response to an invitation by South Dublin County Council for submissions to the Draft South Dublin County Development Plan 2022–2028, Proposed Material Alterations.

While this submission is confined to the Proposed Material Alterations, its content is in the context of our earlier submission to the Draft South Dublin County Development Plan 2022–2028. ESB acknowledge the overall ambition of the Draft Plan to reinforce climate change policies. We welcome the further emphasis being delivered through the proposed amendments that support the reinforcement and strengthening of electricity transmission and distribution networks in the County.

Proposed Material Alterations

It should be noted that since the publication of the Draft Plan, the Minister of Communications, Climate Action and Environment recently launched the updated Climate Action Plan 2021. The Climate Action Plan follows the Climate Act 2021, which commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 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 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. Energy storage systems and landside developments for offshore wind and an enhanced electricity Transmission and Distribution Grid are essential to achieving these targets. 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.

According to the Climate Action Plan 2021, the share of electricity from renewable energy increased almost five-fold between 2005 and 2008 – from 7.2% to 33.7%. 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. These are encouraging trends, but further acceleration of deployment is necessary to achieve the Government's target for 2030.

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 renewable operating today. By 2030, 63% of our electricity will come from renewable sources. We 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, which will be key to facilitating large scale renewables in the future. In this regard, please note our comments on the Proposed Amendments below.

Proposed Amendment No. 11.7 – Electricity Infrastructure

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. In this regard, we welcome and support the proposed introduction of the new section 11.5 *Electricity Infrastructure*.

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 system will be instrumental in supporting the development of energy initiatives in the county. The proposed insertion of section 11.5, Policy IE6 and IE6 Objective 1 through IE6 Objective 5 is consistent with National and Regional Policy in the relation to the development of energy networks.

Proposed Policy IE6 *Electricity Infrastructure*, states:

“Protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments.”

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, the proposed introduction of IE6 Objective 5 provides the necessary support for existing transmission routes to be protected from inappropriate development and their scope for development maintained.

Notwithstanding the Government’s aim to increase the percentage of electricity generation from renewables to 80% by 2030, the contribution from non-renewable sources will still consist of 20%. Furthermore, on dull still days or nights, almost all electricity may sometimes need to come from non-renewables generation.

At Draft Stage we highlighted that the requirement for renewables-enabling plant was not acknowledged in the Draft Plan. Given that South Dublin County Council has access to Gas Network, the inclusion of the text below as in proposed section 11.5 as part of Proposed Amendment No. 11.7 is welcomed.

“It is recognised that natural gas, particularly renewable and indigenous gas, will 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 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.

Proposed Amendment No. 13.10 – Car parking/Charging for Electric Vehicles (EVs)

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. ESB note that section 13.8.3 of the Draft Plan demonstrates South Dublin Co. Co.’s commitment to support and facilitate the rollout of the necessary infrastructure to ensure an increase in the usage of Electric Vehicles. However, as noted, 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 and sets out standards for various developments. In this regard we welcome that this increase is reflected in the proposed amendment to section 13.8.3 of the Draft Plan.



However, in preparing the final CDP, an opportunity exists to provide further clarity to developers, 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 County Development Plan increases capacity for 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* are fully incorporated into the final plan. The standards in Table 1 below are consistent with the above Regulation and should be considered to further amend the relevant development management standards in the final plan.

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

Conclusion

ESB, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. We request that due consideration is given to the issues raised in this submission, most particularly:

- The final Plan should maintain the planning policies which protect the County’s future capacity for the development of energy infrastructure. Ensuring that the long-term operational requirements of existing utilities are protected.
- ESB request that consideration be given to further amend *Notes on Parking Standards*, to ensure the implementation of the latest EV Charging Point 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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