

Senior Executive Officer,
Planning Department,
Carlow County Council,
Athy Road,
Carlow

23rd March 2022

Re: Material Alterations - Draft Carlow County Development Plan 2022-2028

Dear Sir/Madam,

This submission by Electricity Supply Board (ESB), 27 Lower Fitzwilliam Street, Dublin 2, is in response to an invitation by Carlow County Council for submissions to the Carlow Draft 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 Carlow County Development Plan 2022-2028. ESB acknowledge the overall ambition of the Draft Plan to reinforce climate change policies and we welcome the further emphasis being delivered through the proposed amendments.

Proposed Material Alterations

The Minister of Communications, Climate Action and Environment recently launched 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 Amendments No's. 51, 52 & Appendix VI RES (6.8) – Co-Location of Renewables

Hybrid renewables consists of two or more renewable energy sources used together to provide increased system efficiency as well as greater balance in energy supply, whilst optimising use of existing infrastructure. By developing hybrid renewables plant consisting of wind, solar and battery exporting from common point of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved on.

As mentioned in our submission at Draft Stage, repowering with hybrid renewables can grant a new lease of life to existing windfarms and other generation sites. As recognised in the Draft Plan, County Carlow is well served by the grid with an existing 220kV and 110kV transmission lines providing a high-capacity path for power to the East Coast. This is in addition to an extensive 38kV network. In this regard we welcome the proposed amendments in the Written Statement and reinforced in the Renewable Energy Strategy that include promoting objectives for the co-location of renewable technologies.

Amendment No. 51 provides additional text that sets out the context for the co-location of renewables, outlining that *'renewable energy technologies can also be successfully co-located, or located alongside installations for energy storage, conversion, and grid stability. This approach can help enable greater penetration of renewable energy on the national grid, as well as integration of renewable electricity with transport and the gas grid.'* ESB supports this, along with Amendment No. 52 that proposes to insert a new policy, RE P2 into Section 7.10.1 *'Renewable Energy'*, stating:

"Support the co-location of renewable energy technologies on a case-by-case basis subject to compliance with planning and environmental criteria."

The above is further reinforced in an Amendment to Appendix VI, *Renewable Energy Strategy*, with the introduction of Section 6.8 *Co-Location of Renewable Technologies and Projects* and the associated supporting Policy Objective set out in Section 6.8.1 that mirrors RE P2 above.

The inclusion of these additional objectives strengthens a robust County Development Plan that provides a clear policy position for the consideration of renewable energy in land-use planning and will allow County Carlow to maximise its contribution to achieving EU and national targets through the optimum use of natural resources.

Proposed Amendment No. 164 – EV Charge Points

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. In this regard, we welcome the proposed Amendment to Section 16.10.12 *EV Charging Points*, that incorporates the latest standards as set out in Statutory Instrument No. 393/2021 – *European Union (Energy Performance of Buildings) Regulations 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.

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:

- We welcome the addition of policies supporting the co-location of renewable technologies which will provide increased system efficiency as well as greater balance in energy supply, whilst optimising use of existing infrastructure.
- ESB support proposed amendment 164, 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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