

Wicklow County Development Plan
County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town.

25th May 2022

Re: Draft Wicklow County Development Plan 2022-2028 – 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 Wicklow County Council for submissions to the Draft Wicklow 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 submissions to the Draft Wicklow 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

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 V1-64: Section 16.2.1 Electricity Generation

Wicklow is already contributing to renewable wind energy generation, with installed and planned renewable energy projects throughout the county. We acknowledge that in line with the requirements of Section 28(1C) of the Planning and Development Act 2000 (as amended) the above amendment outlines that Wicklow County Council aims to put in place the appropriate supports that will allow the county to contribute its share of the additional onshore national renewable electricity target. In this regard, a renewable energy target estimate of 255MW is highlighted to cover the CDP period. The footnote on the amendment outlines how the above figure was calculated; based on the targets in the 2019 Climate Action Plan. ESB welcome the ambition of this amendment, however we request that the target is reviewed in the context of the updated Climate Action Plan 2021 and its associated revised targets.

Proposed Amendment V1-65: Section 16.3 Energy Infrastructure and Communication Objectives

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. In reviewing Chapter 16, Information, Communications and Energy, ESB acknowledge the overall consistency and alignment with the objectives of the NPF, RSES and national guidelines and the ambition of Wicklow County Council to contribute to achieving national targets in consultation with local communities and businesses. Therefore, we welcome the proposed inclusion of an additional objective (CPO 16.xx) that reinforces support for the development of alternative and renewable sources of energy:

"To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel."

Proposed Amendment V1-66: Section 16.3 Energy Infrastructure and Communication Objectives

As highlighted in our earlier submissions, hybrid renewables consist 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 recognised in the Draft Plan, County Wicklow is well served by the grid with an existing 220kV and 110kV transmission lines in addition to an extensive 38kV network. In this regard we welcome the proposal to insert a new objective into section 16.3

"To support and facilitate the co-location of renewable energy developments and technologies to ensure the most efficient use of land identified as suitable for renewable energy generation."

Proposed Amendment V1-68: Section 16.3 Energy Infrastructure and Communication Objectives

Hydrogen, which is produced from renewable energy sources, offers potential for large scale 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.

Proposed Amendment V1-68 highlights that hydrogen energy is becoming a major part of the clean energy mix in Europe and will be key to the decarbonisation of our economy. The above amendment recognises the opportunity to develop the technology and ESB welcomes the inclusion of this Objective.

"To support the research and development of green hydrogen as a fuel for power generation, manufacturing, energy storage and transport."

Proposed Amendment V1-54 & 70: CPO 12.8 & CPO 16.26

ESB welcome the above proposed amendments that aim to strengthen the existing Wicklow County Council policy of promoting electric vehicle charge points. ESB welcome the above initiatives to increase the rate of provision of charging points for electric cars.

Through CPO 12.8 Wicklow County Council has incorporated the latest standards for the provision of EV Charge points as set out in S.I. No. 393/2021. The implementation of the latest standards 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.

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.

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 acknowledge that in line with the requirements of Section 28(1C) of the Planning and Development Act 2000 (as amended) we support the proposal to insert clear renewable energy targets for the CDP period. However, we would request that these targets are revised to align with the updated Climate Action Plan 2021.
- The final Plan should maintain the planning policies which protect the County's future capacity for the development of energy infrastructure. The proposed inclusion of additional objectives that reinforce support for hybrid energy solutions and the development of green hydrogen are welcomed.
- ESB support the further amendment of Objectives CPO 12.8 and CPO 16.26, 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,



Colm Cummins | Senior Planner | Engineering & Major Projects | ESB
T: +353 1 702 6357 / +353 87 763 8171 | www.esb.ie