

Senior Executive Officer,
Planning Department,
Meath County Council,
Buvinda House,
Dublin Road,
Navan,
Co. Meath,
C15 Y291.

29th June 2021

Re: Proposed Amendments to the Draft Meath County Development Plan 2021-2027

Dear Sir/Madam,

This submission by Electricity Supply Board, 27 Lower Fitzwilliam Street, Dublin 2, is in response to an invitation by Meath County Council for submissions to the Meath Draft County Development Plan 2021–2027 Proposed Material Amendments.

While this submission is confined to the Proposed Material Amendments, its content is in the context of our earlier submission to the Meath County Development Plan 2021-2027. ESB welcome the proposed amendments that aim to reinforce climate change policies and wish to highlight opportunities to further strengthen the final plan, as a result of advancements in renewable technologies.

Proposed Material Amendments

Proposed Material Amendment Chapter 6.11

The Draft 2030 National Energy and Climate Plan envisaged a target of at least 55% renewable energy in electricity by 2030. However, in 2019, the Minister of Communications, Climate Action and Environment committed to raise the amount of electricity generated from renewable sources to 70% in the National Energy and Climate Plan by 2030 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.

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. This is an encouraging trend, but further acceleration of deployment is necessary to achieve the Government's target for electricity of 70% from renewables by 2030.

In this context, we wish to respectfully highlight that proposed amendment Chapter 6.11, that seeks to amend text in section 6.15.3.2 *Wind Energy* references the outdated 55% target. This should be further amended to reflect the updated 70% target of the National Climate Action Plan.

Proposed Material Amendment Chapter 6.6, 6.7, 6.8 & 6.9

In line with the Government's response to the Climate Change Crisis, ESB is implementing programmes supporting the Government strategies to reach Ireland's 2030 reduced emissions targets and 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, hydrogen, biomass etc.

ESB's Brighter Future Strategy sets out the aspiration to develop in excess of 2GW of offshore wind in Ireland and the UK by 2030. Already, we are working on developments in the Irish Sea, off the coast of neighbouring County Louth. ESB in partnership with Parkwind aims to develop Oriel and Clogherhead offshore wind farms in the coming years. The Oriel Wind Farm planning application is at an advanced stage of preparation and the development aims to deliver 330MW of renewable energy.

The emergence of opportunities to exploit offshore energy potential have developed significantly in recent years and will continue to do so as technology advances in this sector. ESB support the proposed updates to section 6.11.2 *National Marine Planning Framework (Draft)* by proposed amendment Chapter 6.6, that now includes the statement below.

"...Consideration of the objectives of the plan, once adopted will form part of the decision-making process for marine development and activities".

Under section 6.15.3.2 *Wind Energy* in the Draft Plan it is recognised that the growth of renewable energy and in particular wind energy requires the modernisation and expansion of electricity infrastructure. ESB support proposed amendments 6.8 & 6.9 that recognises the role of offshore renewable energy development and the range of policy areas that must be coordinated to create the conditions necessary to support the development of these sectors. With a coastline on the Irish Sea, the continued cooperation and support of Meath Co. Co. will ensure the development of key supporting ancillary onshore infrastructure required for the development of offshore wind farms in the Irish Sea can be accommodated.

Proposed Material Amendment Chapter 5.14

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 in order 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.

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.

In line with ESB Strategy, we are also examining the role ESB could play in a hydrogen economy. This could include the development of Hydrogen projects that are fully aligned with the "*EU strategy on energy sector integration*" launched in 2020. This prioritises a more 'circular' energy system, with energy efficiency at its core, greater direct electrification of end-use sectors like transport and buildings 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 and the cement/oil industries.

In this regard we welcome the proposed amendments to section 5.7.5 of the Draft Plan that seeks the continued support of EV's along with the development of alternative methods to fuel the transport sector. 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.

Proposed Material Amendment Chapter 11.1

In relation to proposed amendments to the Development Management Standards and in the context of the above supporting objectives in relation to sustainable transportation, ESB wish to highlight that, the EU Energy Performance of Buildings Directive comes into force soon. The new Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure.

In this regard, in the preparation of 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 Development Standard Objectives 94 & 95 align with the new Directive, ESB propose that both Objectives be amended as follows.

DM OBJ 94

"All car parks shall include the provision of necessary wiring and ducting to be capable of accommodating future Electric Vehicle charging points, at a rate of ~~10%~~ -20% of total space numbers.

DM OBJ 95

*"In any car park in excess of 20 spaces where public access is available, ~~one~~ **four** fully functional charging point for Electric Vehicles shall be provided in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems.*

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, Ireland's leading electricity utility, 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;

- Proposed amendment Chapter 6.11, that seeks to amend text in section 6.15.3.2 *Wind Energy* and references 55% of renewable energy in electricity generation. This was amended to a 70% target in National Climate Action Plan.
- The emergence of opportunities to exploit offshore energy potential have developed significantly in recent years and will continue to do so as technology advances in this sector. ESB support the proposed updates to section 6.11.2 *National Marine Planning Framework (Draft)* by proposed amendment Chapter 6.6 & 6.7, and proposed amendments 6.8 & 6.9 that recognise the role of offshore renewable energy development and the range of policy areas that must be coordinated in order to create the conditions necessary to support the development of these sectors.
- The EU Energy Performance of Buildings Directive comes into force soon. The new Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure. By updating DM Objectives 94 & 95, an opportunity exists to ensure



Energy for
generations

that the new County Development Plan will be consistent with National and Regional Policy in relation to the provision of electric vehicle infrastructure over the lifetime of the new plan.

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,

Gerard Crowley

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