

Development Plan Team,
Planning and Strategic Infrastructure Department,
Fingal County Council,
County Hall,
Main Street,
Swords,
Co. Dublin,
K67 X8Y2

22th December 2022

Re: Draft Fingal County Development Plan 2023-2029 – 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 Fingal County Council for submissions to the Draft Fingal County Development Plan 2023–2029, 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 Fingal County Development Plan 2023–2029. 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

ESB welcome Proposed Amendment PA CH 5.1, that recognises the updated Climate Action Plan 2021 and proposed to replace references to earlier versions. 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 PA CH 5.6, PA CH 11.17 & PA CH 11.18

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. In this context, welcome the inclusion of the additional text to Policy CAP13.

"Actively support the production of energy from renewable sources and associated electricity grid infrastructure, such as from solar energy, hydro energy, wave/tidal energy, geothermal, wind energy, combined heat and power (CHP), heat energy distribution such as district heating/cooling systems, and any other renewable energy sources, subject to normal planning and environmental considerations."

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. Fingal has a very strong electrical grid and substation network, and this system will be instrumental in supporting the development of the renewable energy industry in the county. In this regard, we acknowledge and support the East Meath-North Dublin Grid Update.

Proposed Amendment PA CH 5.8

We welcome the proposed amendment above that includes a commitment to prepare a Wind Energy Strategy over the lifetime of the County Development Plan. This updated commitment offers an opportunity to ensure consistency with National Guidelines.

Proposed Amendments PA CH 5.4, PA CH 5.5, PA CH 11.13

We welcome the recognition set out in the above amendments that in addition to the primary sources of renewable energy, other sources of renewable energy exist, including green hydrogen and biofuels which have the potential to contribute to the overall goal of decarbonising the energy sector.

ESB's plans include investment in a green hydrogen production, storage and generation facilities towards the end of the decade. A clean, zero-carbon fuel, green hydrogen will be produced from renewable energy and used for power generation, heavy goods vehicles in the transport sector and to help decarbonise a wide range of industries such as pharmaceuticals, electronics and cement manufacturing.

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:

- Support for the commitment to prepare a wind energy strategy within lifetime of the plan is welcomed.
- The final Plan should maintain the planning policies which protect the County's future capacity for the development of energy infrastructure. The proposed consequential updates following the publication of the Climate Action Plan 2021 and the reinforcement of support for renewable energy solutions are welcomed.

- 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.

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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