



Energy for
generations

ESB Group Property

Issues Stage - Kerry County Development Plan 2022 - 2028

Submission on behalf of ESB to the Kerry County Development Plan 2022 – 2028
Strategic Issues Paper.
21/08/2020



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1. INTRODUCTION

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to the Kerry County Development Plan 2022 – 2028. ESB is a landowner and employer in Kerry with property and infrastructural assets throughout the county. As a strong, diversified, vertically integrated utility, ESB operates right across the electricity market; from generation, through transmission and distribution to supply of customers. In addition, ESB uses its networks to carry fibre for telecommunications and to provide charging infrastructure for electric vehicles. ESB is Ireland's leading electricity utility with approximately 3.2 million customers throughout the island of Ireland.

ESB broadly supports the vision included in Pre-Draft County Development Plan Issues Paper. Outlined below are observations regarding strategic issues that should be taken into consideration in the preparation of the Draft Kerry County Development Plan 2022 - 2028.

1.1 Overview of ESB Strategy

ESB is Ireland's foremost energy company and the largest supplier of renewable electricity in Ireland. Through innovation, expertise and investment, ESB is leading the way in developing a modern, efficient electricity system that is capable of delivering sustainable and competitive energy supplies to customers in the 'all-island market' (Republic of Ireland, Northern Ireland, England, Wales and Scotland). ESB operates a renewable energy portfolio that has the capacity to supply over 830 MW of green energy to the homes, farms, hospitals, schools and businesses of Ireland and the United Kingdom.

ESB is embracing new technologies that are revolutionising the energy industry, including smarter electricity networks. We are investing in sustainable energy solutions that harnesses the power of solar, wind, wave and storage to provide a cleaner future. Our goal is to reduce ESB's carbon emissions 40% by 2030 and move towards becoming carbon-neutral by 2050. By the end of 2020, ESB will be delivering one-third of its electricity from renewable generation as it progresses towards achieving carbon net-zero operations which is consistent with the objectives of the National Planning Framework (NPF) and Regional Spatial & Economic Strategy (RSES) for the Southern Region.

1.2 Transmission & Distribution

ESB is the asset owner of the Transmission System and Distribution System and ESB Networks provides the essential service of building, managing and maintaining the electricity networks in Kerry and throughout Ireland. ESB Networks is unique in that it is in direct contact with all electricity users. The electricity network extends to over 180,000km across the Republic of Ireland and in 2018 over 26,900 new residential and business connections were completed.

The focus on recent investment in the network was on continuing the reinforcement of the system to facilitate the connection of new renewable electricity generation.

1.3 ESB Roll-out of EV Infrastructure

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.

1.4 ESB Telecoms & Telecommunications Infrastructure

ESB Telecoms has grown from its original function of providing a communications system for ESB to become Ireland's leading independent telecommunications infrastructure provider with over 400 locations nationwide. ESB Telecoms now provides network solutions for a wide variety of mobile network operators, wireless broadband providers and public sector business activities. All sites developed by ESB Telecoms are made available to third party mobile phone and wireless broadband operators as points for co-location. Our open policy of sharing infrastructure limits the overall number of telecoms structures appearing in urban and rural landscapes.

In addition, SIRO (a joint venture between ESB and Vodafone) is bringing 100% fibre-to-the-building to 50 towns across Ireland enabling speeds of 1 Gigabit per second. SIRO will continue to accelerate this roll-out in 2020.

2. PLANNING POLICY & PROPOSED DRAFT CDP

In reviewing the Kerry County Development Plan 2022 - 2028 Issues Paper, ESB has a number of observations in relation to the key issues identified that may set the framework for the future development of the county. ESB acknowledges that the process of preparing a new County Development Plan shall be informed by the hierarchy of planning policy in Ireland. Both the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES) contain policies in relation to Energy Infrastructure.

In addition, we welcome the recognition that the County Development Plan will play an important role in influencing a reduction in Green House Gas (GHG) Emissions by guiding the sustainable growth of the county. ESB is working towards the delivery of Ireland's target (part of the pledged EU target) of at least 40% reduction in domestic GHG emissions by 2030 compared to 1990.

The draft 2030 National Energy and Climate Plan envisages a target of at least 55% renewable energy in electricity by 2030. In 2019, the Minister of Communications, Climate Action and Environment committed to raise the amount of electricity generated from renewable sources to 70% by 2030 with no generation from peat and coal in the Climate Action Plan 2019. 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.

ESB supports a review of the County Development Plan which will include policies and objectives to support the delivery of energy infrastructure to meet future energy needs.

2.1 Transmission & Distribution

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. The new County Development Plan 2022 – 2028 must continue to ensure that the long-term operational requirements of existing utilities are protected.

Under the heading *Infrastructure & Energy*, the Issues Paper recognises that in order to facilitate progressive sustainable development across the county, the provision of high-quality infrastructure is essential. In this regard, we would welcome the continuance of the Energy Policy set out in Chapter 7 of the existing County Development Plan. In particular, Policy Objective EP-3 which states;

“Facilitate sustainable energy infrastructure provision, so as to provide for the further physical and economic development of the County.”

However, ESB would welcome a review of Policy EP-8 in the context of updated National and Regional Policy. In its current form, Policy EP-8 emphasises the priority of options, in advance of the required analysis and planning process, it states;

“Ensure that the siting of electricity power lines is managed in terms of the physical and visual impact of these lines on both the natural and built environment, the conservation of Natura 2000 sites and especially sensitive landscape areas. When considering the siting of powerlines in these areas, the main technical alternatives considered should be set out, with particular emphasis on the undergrounding of lines, and the identification of alternative routes at appropriate locations. It should be demonstrated that the development will not have significant, permanent, adverse effects on the environment including sensitive landscape areas and the ecological integrity of Natura 2000 sites.”

It is always the objective to develop and maintain a safe, secure, reliable, economical and efficient electricity Transmission and Distribution system with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment. However, the inclusion of the above policy that seeks to place the emphasis on one particular solution may disadvantage the development of the optimum design for energy networks infrastructure as all the technical, environmental and economic factors may not be equally considered.

The NPF supports the reinforcement of the transmission and distribution network in order to facilitate planned growth of a more renewable focused sources of energy across major demand centres. The RSES for the Southern Region also contains supportive policies in relation to the reinforcement and provision of new energy infrastructure, through RPO 219 – RPO 224. The aforementioned Policies contain supportive statements in relation to the delivery of energy networks for the Region and reaffirm that all developments are subject to appropriate environmental assessment and the planning process. This is highlighted in RPO 224, which states;

“Local Authorities shall work in partnership with existing service providers to facilitate required enhancement and upgrading of existing infrastructure and networks (subject to appropriate environmental assessment and the planning process) and support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.”

The Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure (July 2012) emphasises the strategic and economic importance of investment in networks and energy infrastructure. Under this policy the Government has mandated the State-owned Networks Companies to deliver the State’s network investment programmes in the most cost efficient and timely way possible in the interests of all energy consumers who need the investment and who also pay for it.

Government policy recognises that public acceptability is required for the delivery of key networks projects and that to achieve public confidence project proposals must adhere to the highest international standards of safety, health and environmental and visual impact, and technology choice. The Government affirms *“that EirGrid and ESB Networks and Bord Gáis are obligated to adhere to all relevant guidelines and standards and they act in the national interest, and on behalf of all electricity consumers.”*

It is recognised that concerns about visual, amenity, health and safety need to be mitigated through the consultation process. The NPF, RSES and Local Development Plans and the Strategic Infrastructure Act provides the necessary framework for ensuring that all necessary standards are met, and that extensive statutory and non-statutory consultation is an intrinsic part of the planning

process. This ensures that there is ongoing consultation with local communities and local authorities regarding the construction of new networks.

ESB submit that Energy Policy EP-8 in the existing County Development Plan is not consistent with national or regional policy and should be reviewed as part of the process to prepare a new draft plan for the County.

2.2 Renewable Generation

The Issues Paper highlights that Kerry County Council is committed to playing its role in achieving a transition to a low carbon, climate resilient and environmentally sustainable economy. In this regard and in line with the Government's response to the Climate Change Crisis, ESB is committed to leading the delivery of a low carbon energy sector. We are 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 55% with a broader range of technologies likely to be deployed, e.g. offshore wind, solar, biomass.

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.

It is recognised that as a county, Kerry has made a significant contribution to renewable energy Nationally. As stated in the Issues Paper, there are 350 wind turbines operating in the county, exporting a maximum of 735MW of electricity. The Kerry County Council, Renewable Energy Strategy 2012 sets out the development criteria, development management standards and objectives and has been used in the assessment of all planning applications for all renewable developments. ESB welcome the recognition in the Issues Paper that the renewable energy objectives set out in the current County Development Plan need updating, under *Renewable Energy* it states;

"It is important that the renewable energy objectives set out in the current County Development Plan are updated have regard to National policy and the overall targets towards reducing our carbon emissions and dependency on imported energy and fossil fuels."

A review of the Wind Energy Development Guidelines 2006 has been underway since 2013. In June 2017 a "preferred draft approach" was jointly announced between the Dept. of Housing, Planning, Community & Local Government (DHPCLG) and the Department of Communications, Climate Action and Environment (DCCA). The recently published Draft Revised Wind Energy Development Guidelines (2019) confirm the "preferred draft approach". ESB respectfully request that the existing policies on windfarms set out in the current Plan and updated Renewable Energy Strategy, are aligned with the most up to date advice and guidance from the Department of Communications, Climate Action & Environment.

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.

2.3 Telecommunications

The existing County Development Plan recognises that telecommunications investment is essential to furthering the social and economic development of County Kerry. A high quality and competitive

telecommunications service is considered essential in order to promote industrial and commercial development and to improve personal security, enhance social inclusion and mobility.

Section 7.5 *Information and Communication Technology (ICT)*, and associated Policy Objectives ICT-1 – ICT-5 in the current Development Plan set out the requirements for a proposal for planning permission for telecoms infrastructure. ESB supports the continuance of these Objectives and the view of Kerry County Council that, in considering location requirements, it will take guidance from the ‘*Telecommunications Antennae and Support Structures*’ (July 1996)’ and Circular Letter PL07/12.

The updated Guidelines facilitate the improved development of telecommunications infrastructure and promotion of a policy of co-location. All ESB Telecoms Mast sites are open for co-location and duplication of infrastructure is reduced as a result.

ESB’s telecoms infrastructure in the county continues to assist in delivering enhanced communications networks through the provision of backhaul fibre and shared telecommunications towers. ESB supports the Telecommunications policy that promotes co-location.

2.4 Sustainable Transport & Electric Vehicles

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 in order 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.

We support the view set out on page 7 of the Issues Paper, that the draft plan will be guided by National Strategic Outcomes of the NPF, including;

“Sustainable Mobility. *As part of the national climate mitigation plan support the use of electric vehicles and smarter travel initiatives in the Electoral Area.”*

The existing Development Plan highlights the Councils’ support for the Governments Electric Transport Programme under Section 7.2 *Land use Integration & Sustainable Transport* and also under Section 7.6 *Energy/Power Provision*. This is clearly reflected in Policies RD-15 and EP-5 which state;

RD-15

“Identify car parks and other suitable locations for the provision of appropriate battery charging infrastructure for electrically powered cars/vehicles as a means by which the Council can assist in achieving a reduction in carbon emissions with the county.”



EP-5

“Facilitate the sustainable provision of charging infrastructure for electric vehicles.”

ESB welcome the continuance of the above policies, however, we respectfully suggest that an opportunity to further promote EV Charging Points exists if clear guidelines were also included in the Development Management Standards for Parking in the draft plan. This would further facilitate growth in charge point infrastructure, to become a comprehensive network of public and domestic charge points.

3. CONCLUSION

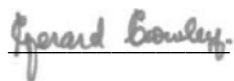
Investment in infrastructure is crucial to the economic and social well-being of our country. Such investment creates jobs, stimulates economic activity and provides modern, efficient facilities to provide the services that people need including healthcare, education and community services amongst others. There is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. This investment in infrastructure is also necessary to support EU and national policy on Climate Change adaptation and mitigation.

ESB, Ireland's leading electricity utility, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. Sustainability, both within the company and in the services we provide, is integral to our corporate strategy. We are committed to reducing carbon emissions and addressing long-term concerns over future fuel supplies. 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, that the Draft County Development Plan includes the clear policies outlined in relation to:

- Protecting the County's future capacity for the development of electricity Transmission and Distribution infrastructure. In this regard, the statutory planning framework provides the necessary structures for ensuring that all necessary standards are met, and extensive statutory and non-statutory consultation is an intrinsic part of this planning process for delivery necessary infrastructure enhancement. Therefore, ESB submit that Energy Policy EP-8 is reviewed in the context of updated NPF and RSES for the Region.
- Backing the delivery and continuation of a secure and resilient supply of energy that optimises the use of the renewable energy resources of the County to address climate change, support job creation and the move to a competitive low carbon Green Economy, while also protecting the environment and amenities of the county.
- Facilitating expansion and improvement in telecommunications infrastructure and to help position the county to attract intellectual & physical capital and to act as a mechanism to improve virtual connectivity.
- Promoting, encouraging and facilitating the use of sustainable modes and patterns of transport including electric vehicles, including Parking Standards that will set minimum levels of parking provision for EVs.

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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Moira Murrell
Chief Executive
Kerry County Council
By email only: info@kerrycoco.ie

20th August 2020

Re: Kerry County Development Plan 2022-2028 / Pre-Plan Consultation

Dear Moira,

I am writing to you with observations and to formally submit to your Strategic Plan from the perspective of Cork Kerry Community Healthcare which has responsibility for the delivery of health and personal social services in the community across the 2 counties.

There are a number of key overarching principles that I would like to see embedded in your strategic plan from a health service perspective.

- Inclusion of health priorities in all civic planning processes – including from here forward, Covid 19 related issues and requirements
- Infrastructure – including housing and specific service requirements for service users – sharing our capital plan priorities as appropriate
- Access – including transport and social inclusion issues etc – enabling all sections of society to live full productive lives –focus on disadvantaged groups.
- Critical role of community supports to enhance health – increase interdepartmental and inter-sectoral working and learning’s from the successful co-ordination and co-operation as seen throughout the recent Covid period.
- Progression of Health and Wellbeing agendas

These 5 key areas are fundamental and shared across our organisation and in implementing your strategic plan, their incorporation can yield significant health benefits to citizens, while also allowing greater access to necessary services of benefit to the public and allowing such services to be delivered at the ‘right time and in the right place’.

I would welcome further engagement on these priorities and we can be more specific if required at this stage.

I look forward to hearing from you.

Yours sincerely,



Michael Fitzgerald
Chief Officer

Sharon O'Keeffe

From: Eileen Flahive McElligott [REDACTED]
Sent: Thursday 20 August 2020 18:29
To: planpolicy
Subject: Review of county development plan

[Caution: External Sender] Use care when opening attachments or clicking links unless you can verify the sender.

I and my family ask that Asdee have its village status restored on tier 4 of the KCC settlement hierarchy. This is extremely important to me and my family Asdee village has a huge role in our life from a social point of view for our clubs and church and local businesses.

Eileen Mcelligott.

Asdee.

Sent from my iPhone

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Sharon O'Keeffe

From: [REDACTED]
Sent: Thursday 20 August 2020 18:51
To: planpolicy
Subject: Village Status

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I would like to request that the village of Asdee status be restored to its village status, tier 4 of the KCC hierarchy.

The reason I am requesting this is because firstly I'm from Asdee and secondly I'm part of the Asdee Community Development Association. We are in the process of regenerating Asdee and not having a village status could hinder our plans for the future.

Thanking you in advance

Norelle Whyte

Sent from AOL Mobile Mail
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Sharon O'Keeffe

From: Theresa Coughlan [REDACTED]
Sent: Thursday 20 August 2020 18:52
To: planpolicy
Subject: 2022-2028 Development Plan

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To whom it may concern

It has been brought to our attention the Kerry County Council is drawing up its plans for 2022-2028 Development Plan and that Asdee is losing its status as a Village and being relegated to a "settlement node". We are asking you to reverse this decision in light of Asdee's recent launch of its five year Socio- Economic Development Plan 2020-2025. This plan was participated actively by the citizens of the community so that Asdee is not another lost part of Rural Ireland. See AsdeeVillage.com for reference.

Patsy and Theresa Coughlan

Sent from my iPad

876

Sharon O'Keefe

From: Aine Kennedy <[REDACTED]>
Sent: Thursday 20 August 2020 19:05
To: planpolicy
Subject: Development Plan 2022 to 2028

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I request that Asdee have its village status restored on tier 4 of the KCC settlement hierarchy.

Asdee is a small village with a huge heart and the community is working hard to improve the village in every way. There are plans being put in place to improve the existing facilities and develop new ones and it is imperative that the village would have village status to proceed with their plans. This is a very urgent matter and seek your support.

Yours in hope

Áine Kennedy
[REDACTED]

Sharon O'Keeffe

From: Jeanette Keane [REDACTED]
Sent: Thursday 20 August 2020 20:46
To: planpolicy
Subject: Review of County Development Plan

[Caution: External Sender] Use care when opening attachments or clicking links unless you can verify the sender.

Dear sirs.

We kindly request that you consider when developing your new plan that the village of Asdee, North Kerry to have its village status restored on tier 4 of the KCC settlement hierarchy.

My family live in Asdee and my family & I have moved back to area recently. Improving our village is very important to all residents.

We'd all appreciate your assistance.

Mrs Jeanette O Connor & family
Asdee.

Sharon O'Keeffe

From: hayley doyle <[REDACTED]>
Sent: Thursday 20 August 2020 20:48
To: planpolicy
Subject: Review of County Development Plan

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To whom it may concern,

I have to ask for Asdee to have its village status restored on tier 4 of the KCC settlement hierarchy. Asdee is very important to me and I love it dearly but it has to become a more attractive place to raise children and facilitate the needs of younger people for a brighter future.

Hayley Doyle.

Sent from my iPhone

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Sharon O'Keeffe

From: Olivia Whyte [REDACTED]
Sent: Thursday 20 August 2020 20:51
To: planpolicy
Subject: Review of county development plan

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Hello,
I wish to request for Asdee to have its village status restored on tier 4 of the KCC settlement hierarchy. The future of Asdee is very important to me as Asdee has a lot to offer including beautiful beaches, a great community, is a lovely place to live, and much more.
Olivia Whyte



Sharon O'Keeffe

From: Sinead Doyle [REDACTED]
Sent: Thursday 20 August 2020 20:56
To: planpolicy
Subject: Review of County Development Plan

[Caution: External Sender] Use care when opening attachments or clicking links unless you can verify the sender.

Dear Sir/Madam,

I would like to request that Asdee village is restored to "village status" on the tier 4 of the Kerry County Council Development Plan 2022-2028. This would ensure economic growth for our area, which in turn will increase our population where more families can enjoy our beautiful scenic coast which is ideally situated in close proximity to Shannon and Kerry Airport.

Sincerely,

Sinead Doyle
Tullahinell