Development Plan Team,
Planning & Property Development Department,
Block4 Floor 3,
Civic Offices,
Wood Quay,
Dublin 8,
D08 RF3F

31st August 2022

Re: Draft Dublin City Development Plan 2022-2028 – Proposed 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 Dublin City Council for submissions to the Draft Dublin City 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 Dublin City 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 – Volumes 1,2 & 4

As recognised throughout the Proposed Material Alterations report and particularly by the proposed amendments to Chapter 1 – *Strategic Context & Vision* and Chapter 3 – *Climate Action*, 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. In this regard we welcome the inclusion of proposed Material Alteration No.'s 1.6, 3.1 & 3.13 that seek to update the City Plan in line with the Climate Action Plan 2021.

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 specific Proposed Amendments below.

Proposed Amendments Ref. No.9.20 – Ch. 9 Energy

ESB supports the promotion of energy infrastructure objectives and submit that they must continue to protect the city's future capacity for the development of energy generating, processing, transmission and transportation infrastructure whilst encouraging the sustainable development of the city's renewable energy resources. In this context, we note and support the proposed amendment to Section 9.5.12 *Energy Utilities* (p. 341).

> "**{In the short to medium term, it is prudent that existing electricity generation capacity needs to be retained in order to ensure security of electricity supply. Any potential impact of large energy users will be assessed against this need.}**
>
> The Council will support energy utility providers in their efforts to **{to deliver,}** reinforce and strengthen existing ~~**(utility infrastructure and)**~~ **{electricity and natural gas}** transmission/ distribution **{grid infrastructure,}** ~~**(networks)**~~ **{electricity interconnection and electricity storage in order to ensure security of electricity supply and support the growth of renewable electricity generation. The Council}** will **{also}**support new infrastructure projects and technologies with particular emphasis on renewable, alternative and decentralised energy sources, and those which are less carbon intensive in line with the Electricity and Gas Networks Sector Climate Change Adaptation Plan (2019) **{and Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition (2021)}**."

Measures that address the urgency of Climate Actions under the Climate Action Plan 2021 and that further reinforce the City Plan are supported by ESB.

Proposed Material Alterations – Volume 3

ESB Networks provides an essential service building and maintaining the electricity networks in Dublin City and throughout Ireland. It is responsible for constructing all the sub-transmission, medium and low voltage electricity network infrastructure in the country and for managing this infrastructure which is owned by ESB.

As outlined in our submission to the draft stage, ESB has several critically important locations across Dublin city that are major engineering and administrative centres for ESB, and operations at these locations include Engineering, Design, Construction, Maintenance, Customer Service and Fault Response. ESB Networks has an obligation, under licence from the Commission for Energy Regulation (CER), to respond to all faults within one hour. To meet response timelines, ESB requires speedy access to the engineering centre for tools and equipment and to the adjoining road networks for travel to the fault location. Good access to the main road networks and areas of potential growth is essential to provide an economic service and to meet emergency response times for Dublin City and County.

Proposed Zoning Map Amendment Ref. No. – E-0060 ESB Polefield, East Wall Road.

As outlined in our submission to the Draft Plan, the ESB former Polefield site at East Wall Road extends to circa 2.6 acres. In the past ESB had a substantial landholding at this location comprising training facilities, transport depot and stores. ESB released any surplus lands to facilitate the construction and operation of the Port Tunnel. The retained ESB lands are adjacent to the interchange and toll infrastructure for the tunnel. The current site has been retained as part of ESB Networks plans for new infrastructure that is essential to increase capacity in the area.

At present the lands are providing temporary surface car parking for the duration of ESB's occupation of the Gateway Buildings on East Wall Road. This is a good interim use for the site as it does not prevent any other development options due to the strategic requirement to retain the site for electricity infrastructure in the future. This compound site is for the future development of a 220kV Transmission Station required to reinforce the local 110kV electricity grid and meet future demand. As a complimentary use along with the substation, this site has been identified as a suitable location for a consolidated depot location to serve the city centre area which will facilitate the release of other ESB lands included in SDRA 6 for residential and mixed uses.

ESB notes the proposed amendment to change the zoning of these lands from objective Z6 – *"To provide for the creation and protection of enterprise and facilitate opportunities for employment creation"* to Z10 – *"To provide inner suburban and Inner City Sustainable Mixed-Uses.* Whilst acknowledging that the primary uses supported in Zone Z10 are residential, office and retail, it is noted that *'Public Service Installation'* is a Permissible Use, and *'Industry (light)'* is identified as an Open for Consideration Use. It is important that proposed land use zoning at this location can facilitate ESB restructuring these facilities to meet operational needs while also conforming to Dublin City Council's long-term vision for compact growth and ensuring the continued consolidation of the city.

Given the proximity of these lands to significant Port Tunnel interchange infrastructure and its associated traffic impacts, such as noise, vibration, vehicle emissions/dust and lighting/glare, ESB are of the view that the Z6 Zoning is more compatible with established surrounding land uses on the north side of the East Wall Road and proposed future electricity infrastructure uses on the site.

In this regard, ESB recommend that Proposed Zoning Map Amendment E-0060 is reviewed and ESB lands revert to Z6 Land Use Zoning.

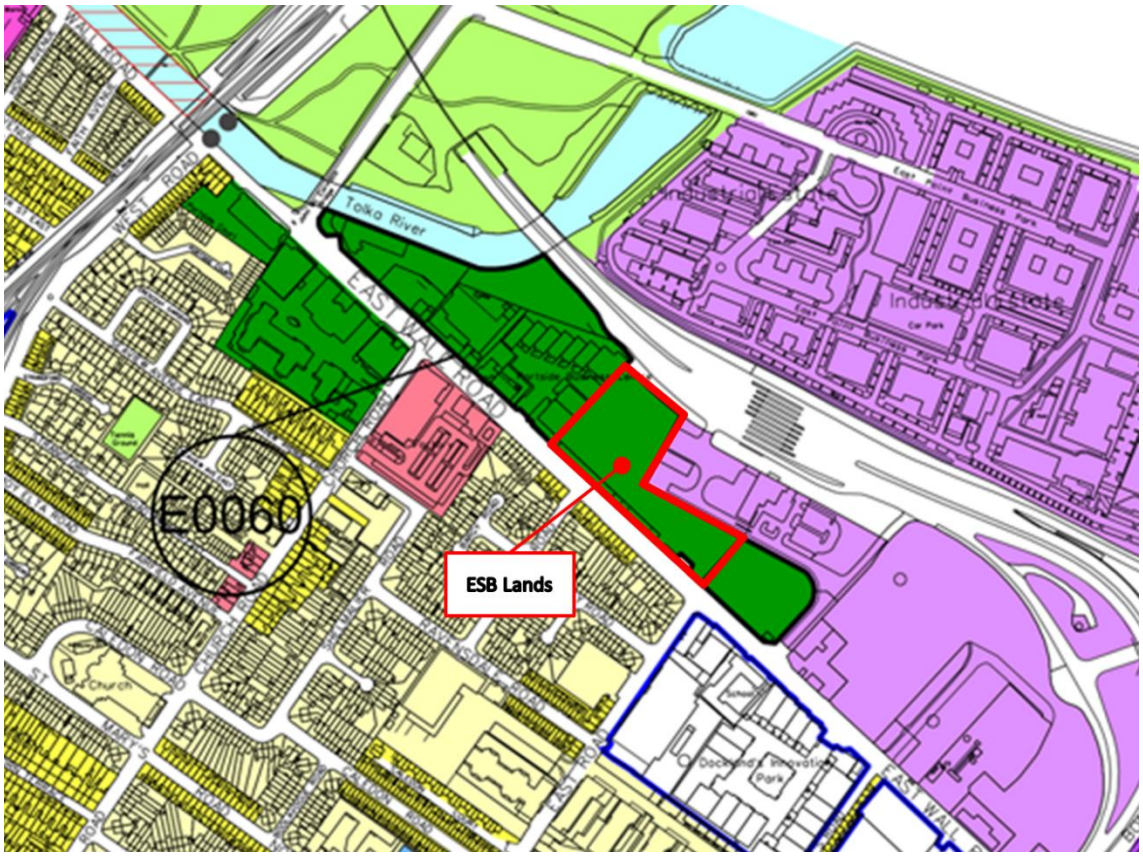

Fig. 1. – ESB Lands at East Wall Road outlined in red – Extract of DCC E-0060 Amendment Map

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:

- 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 renewable energy solutions and associated grid infrastructure are welcomed.

- ESB Networks, serve all 2.3 million industrial, commercial and domestic electricity customers. Our Engineering Centres in Dublin City are critical infrastructure for the construction, maintenance and repair of all transmission and distribution networks. This includes systems safety and fault response within mandatory timelines. It is important that proposed land use zoning can facilitate ESB restructuring existing Engineering Centres to meet operational needs while also conforming to Dublin City Council's long-term vision for compact growth and ensuring the continued consolidation of the city. **ESB recommend that Proposed Zoning Map Amendment E-0060 is reviewed and ESB lands revert to Z6 Land Use Zoning.**

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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