

[REDACTED]

RZLT - Planning Department
Administrative Officer,
Wicklow County Council
County Buildings
Whitegates
Wicklow Town
A67 FW96

Emailed to RZLT@wicklowcoco.ie

01st April 2024

Re: EXCLUSION OF [REDACTED] LANDS AT BRAY 38kV SUBSTATION FROM RZLT DRAFT MAP

Dear Sir/Madam,

This submission by [REDACTED] is in response to an invitation by Wicklow County Council to comment on land that is within the scope of the Residential Zoning Land Tax (RZLT) and identified on the Draft Maps prepared by Wicklow County Council.

[REDACTED] supports the overall objective of the tax to activate land that is serviced and zoned for residential use or mixed use in order to increase housing supply and to ensure the regeneration of vacant and idle lands at appropriate urban locations. However, in this instance, [REDACTED] are seeking the exclusion of its lands at its Bray 38kV Substation, located Herbert Road (see map Appendix A) from the Draft RZLT Map as we believe the conditions for the lands to be subject to the tax are not met.

Site Ownership & Uses

[REDACTED] Bray 38kV substation on Herbert Road is 0.2 hectares in area and comprises transmission infrastructure associated with an 38kV substation. It accommodates critical electricity infrastructure of national and regional importance, serving thousands of commercial and domestic customers in Bray. [REDACTED] finances, builds and maintains the transmission system through which electricity flows from generation stations to bulk supply points such as Bray 38kV substation. We carry out all the functions relating to the electricity distribution system which includes planning, construction, maintenance and operation of the distribution networks and metering of customer end use. [REDACTED] is delivering 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.

[REDACTED] Staff regularly locate at this site for operation inspection and maintenance of the power substation.

All [REDACTED] outdoor substations contain exposed live electrical equipment, and it is standard practice to have an outer compound associated with the station, that acts as a safety buffer for members of the public. Pylons and other overhead infrastructure is generally located on these lands further restricting their development.

Exclusion from Scope of Tax

Section 653B(c)(i) and (c)(ii) of the Finance Act 2021, sets out certain types of lands that are excluded from the tax despite being zoned for residential use and serviced. As outlined below, [REDACTED] lands at this location are required for, integral to and occupied by energy infrastructure and utilities.

1. Under Section 653B (c)(iii)(III) & (IV), land that is reasonable to consider is required for, or is integral to, occupation by **energy or telecommunications infrastructure and facilities**.

[REDACTED]

As outlined above, the [REDACTED] site at Bray 38kV Substation accommodates critical electricity infrastructure of national and regional importance, serving thousands of commercial and domestic customers in Bray and the wider area.

Conclusion

[REDACTED] supports the overall objective of the tax to activate land for residential use, however as a strong diversified utility operating right across the electricity market our focus is on 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, and we seek the exclusion of the [REDACTED] lands at Bray 38kV Substation from the Draft RZLT Map as.

- The lands at Bray 38kV Substation are required for, or are integral to, occupation by a electricity substation.

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,

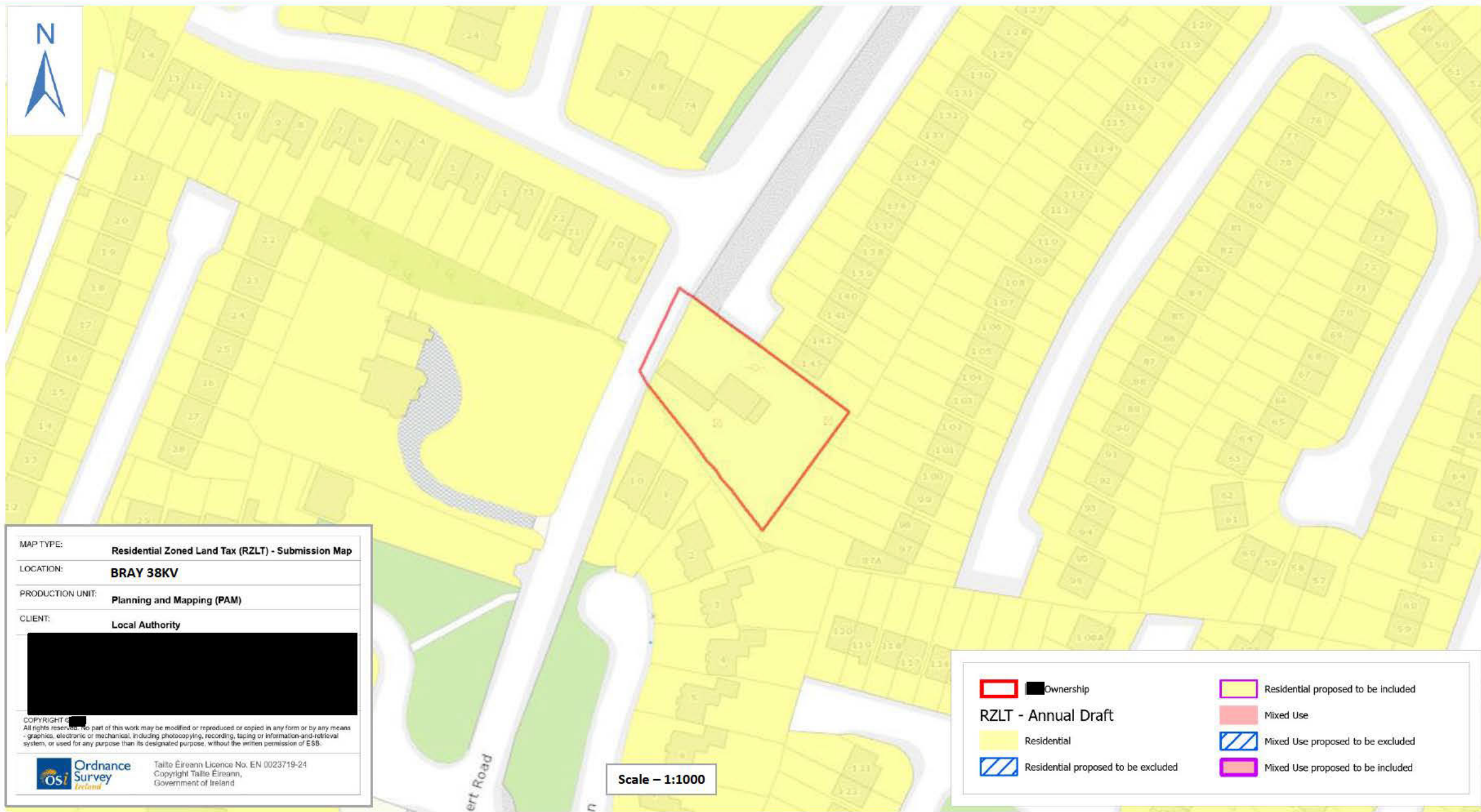


Colm Cummins | Group Property Planning Manager | Engineering & Major Projects |

[REDACTED]



APPENDIX A

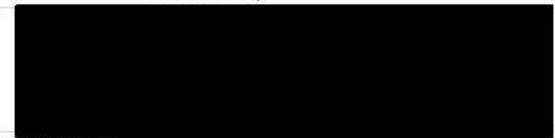


MAP TYPE: **Residential Zoned Land Tax (RZLT) - Submission Map**

LOCATION: **BRAY 38KV**

PRODUCTION UNIT: **Planning and Mapping (PAM)**

CLIENT: **Local Authority**











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Scale - 1:1000

- | | | | |
|---|---|---|-------------------------------------|
|  |  Ownership |  | Residential proposed to be included |
| RZLT - Annual Draft | |  | Mixed Use |
|  | Residential |  | Mixed Use proposed to be excluded |
|  | Residential proposed to be excluded |  | Mixed Use proposed to be included |