



Blessington Local Area Plan Submission - Report

Who are you:	State Body
Name:	Electricity Supply Board
Email Address:	[REDACTED]
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Topic

Compact Growth - Housing - Population Growth

Submission

Please see attached PDF document for detailed submission.

Topic

Economic Opportunity - Tourism - Shops & Services - Community Facilities

Submission

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Topic

Infrastructure - Sustainable Movement - Transportation

Submission

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File

ESB SUB BLESSINGTON LAP ISSUES - ISSUED.pdf, 0.31MB



Energy for
generations

ESB Group Property

Issues Stage – Blessington Local Area Plan

Submission on behalf of ESB to the Blessington Local Area Plan Pre-Draft Public
Consultation Issues Paper.
01/04/2024





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1. INTRODUCTION

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to the preparation of a Local Area Plan (LAP) for Blessington town and environs. ESB is a landowner and employer in Wicklow 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 over 2,000km of fibre optic cable for telecommunications to a total of 472,000 homes and to further provide charging infrastructure for electric vehicles. ESB is Ireland's leading electricity utility with approximately 2.3 million customers throughout the island of Ireland.

ESB acknowledges the ambition of the proposed LAP to set out a land use strategy for the proper planning and sustainable development of Blessington over the life of the plan. We recognise that the LAP will implement a vision following the consultation phase, relating to future development on key issues relating to Social Infrastructure, Economic Development, House and Community, Open Space, Amenity, Climate Change, and Movement in Blessington. Given ESB's extensive Hydro Energy installations in the area and through our support for the development of the Blessington Greenway we have set out below observations regarding strategic issues that should be taken into consideration in the preparation of the Draft Blessington Local Area Plan.

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-islands market' (Republic of Ireland, Northern Ireland, England, Wales and Scotland). ESB operates a renewable energy portfolio that has a total of over 981MW of green energy generation connected to the grid.

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, storage and green hydrogen to provide a cleaner future. Our objective is to develop and connect renewables to decarbonise the electricity system by 2040. ESB's progress towards achieving carbon net-zero operations is consistent with the objectives of the National Planning Framework (NPF) and Regional Spatial & Economic Strategy (RSES) for the Eastern and Midlands Region.

1.2 Generation, Transmission & Distribution

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 renewables operating today. By 2030, 63% of our electricity will come from renewable sources and 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, green hydrogen and flexible gas fired units that respond quickly to system demand. These will be key to facilitating large scale renewables in the future.

In addition, 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 Wicklow and throughout Ireland. ESB Networks is unique in that it is in direct contact with all electricity users. The electricity network extends to over 233,000km across the Island of



Ireland and in 2023 over 41,000 new residential and business connections were completed, along with the installation of over 1.5 million smart meters.

The transition to a low-carbon future powered by clean electricity requires a network that is resilient to the impacts of climate change and disruptive events such as storms and cyber threats. It also recognises we need to build capacity to connect the renewable generation to our network that will generate the clean electricity. In addition, we need to provide network capacity for the demand associated with significant population growth, new housing developments, economic growth, as well as a significant increase in demand due to electrification of heat, transport and industry.

1.3 **ESB Roll-out of EV Infrastructure**

ESB eCars builds, owns, and operates Electric Vehicle Charging Networks for public use in Ireland (ROI), Northern Ireland (NI) and Great Britain (GB). Our public charging network comprises of over 2,000 charge points with a customer base of 85,000 at the end of 2022. Approximately 75% of all EV drivers in Ireland are eCars customers. Twenty-one new High-Powered Charging (HPC) hubs have been commissioned in ROI with a further 20 in various stages of construction. These hubs are primarily located on motorway or primary routes and will provide 100km of range in six minutes.

In the Climate Action Plan (2023) 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 one of Ireland's leading independent telecommunications infrastructure providers 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.

Our telecoms fibre network wrapped on our 110kV electricity network provides an extensive network throughout Ireland with international connectivity to the UK. In addition, SIRO (a joint venture between ESB and Vodafone) is bringing 100% fibre-to-the-building to 50 towns and cities across Ireland and enabling speeds of 1 Gigabit per second. SIRO will continue to accelerate this roll-out in 2024.

2. PLANNING POLICY & PROPOSED DRAFT LAP

In reviewing the Strategic 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 Blessington and its environs. ESB acknowledges that the process of preparing a new LAP 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.

The Wicklow County Development Plan 2022-2028 identifies Blessington as a Level 3 Self-Sustaining Growth Town, and this reflects the town's strategic location along the N81, its proximity to the Dublin Metropolitan Area, and its service as a rural catchment in counties Wicklow, Kildare, and Dublin. As a Self-Sustaining Growth Town, Blessington has been identified as having opportunity for the development of product-based employment facilities, and potential to foster economic links with Newbridge, Naas, and Kilcullen. A key objective of the County Development Plan is to deliver the next phase of the Blessington Greenway, completing the 35km loop around the Pollaphuca Reservoir. ESB will work to support the delivery of key development parameters that will guide the strategic compact growth.

2.1 Electricity Generation, Transmission & Distribution

Both the NPF and the RSES for the Eastern and Midlands, along with the Wicklow CDP contain promoting policies in relation to Energy Infrastructure and ESB fully supports the reinforcement of these policies at a local level. The documents forming these plans contain key guidance in relation to the decarbonisation of the electricity sector. They set out supporting objectives for the enhancement and upgrading of existing infrastructure and the safeguarding of strategic energy corridors from encroachment by other developments that would compromise the delivery of energy networks.

Upgrades to the transmission infrastructure will ensure ongoing adequacy of regional connectivity and to facilitate the connection of renewable energy resources. In this regard, we support the reinstatement of County Development Plan statements that support improvement, development, protection and enhancement of energy infrastructure in the Draft Local Area Plan.

The ongoing need for curtilage management and the restriction of lands uses, which might affect the ability to consolidate and/or expand operations, is essential. Therefore, we would propose supporting statements in the Draft Plan, that seek to reinforce the existing grid including grid connections, transboundary networks into the County and the expansion into areas not adequately serviced.

Our strategy in ESB is driven by our desire to create a low-carbon future powered by secure and affordable clean electricity to drive the carbon, in the form of fossil fuels, out of heat, transport and the economy. We will develop our network and our systems so that they are safe, secure, reliable, flexible, resistant, and forward thinking. ESB is determined to work alongside Local Authorities to build an electrical infrastructure that can accommodate the future demand of the population. In this regard, ESB would welcome opportunities to future proof delivery of electricity infrastructure through greater collaboration between ESB Networks and Wicklow Co. Co. Early engagement at design stage of key public infrastructure projects in Blessington, e.g., new roads, public realm upgrades, and greenways, offer opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services. Please contact the local ESB Office in Naas to ensure input from ESB Networks at an early stage of project design.

At present the electrical load of Blessington Town is served by 1 no. 38kV Station located just off the N81 on the northern fringe of the town.

ESB supports the promotion of green renewable energy objectives and submit that they must continue to protect the County's future capacity for the development of energy generation, processing and transmission.

2.2 ESB Operations at Pollaphuca Reservoir – Blessington Greenway

There are three hydro generation stations on the Liffey. These comprise two 15MW generators located at Pollaphuca and two 4MW generators each at Golden Falls and Leixlip, giving a total installed capacity of 38MW. In creating the water storage for the power stations at Pollaphuca, Golden Falls and Leixlip, the vital need for increased water supplies to Dublin was met by the 5,600-acre reservoir, a significant portion of which abuts the town of Blessington. The scheme was undertaken in three stages - beginning in 1937 and ending in 1949.

ESB's hydro-electric projects have harnessed 75% of the country's waterpower potential. About two percent of Ireland's electricity generating capacity is in the form of hydropower. This power derives mainly from ESB's hydropower stations, with minor contributions coming from smaller, independently owned sites. Excluding pumped storage at Turlough Hill, the Liffey accounts for almost a quarter of ESB's Hydro Generating Capacity and is fully integrated into the local and national electricity transmission and distribution network. These vital local and national activities require both curtilage space to enable future consolidation and expansion and buffer space to protect against inappropriate new neighbouring development. In this regard, ESB strongly support the retention of the Zoning Objective AG-RB from the existing Blessington LAP. i.e., *to provide a 100m buffer from the designated Pollaphuca Reservoir that protects the physical and visual amenity of the area – agriculture within 100m buffer.*

The provided 100m buffer zone has become increasingly important for the safeguarding of the reservoir. Due to nature of operations on the reservoir, with rising and falling water levels, erosion can occur along the banks of the reservoir. The designated buffer is an important tool in the ongoing management of the waterbody and assists with the prevention of unnecessary degradation of the banks of the reservoir.

The primary function of ESB is the generation, transmission and distribution of electricity. The Penstock and Power Station, Dams, Embankments, Reservoirs, Headrace and Tailrace Canals, Transmission and Distribution Stations are elements of an integrated Hydro Electricity Generating System. All elements are part of operational plant and require ongoing inspection, maintenance, repair, upkeep and on occasion emergency safety works.

Dams, canals reservoirs and embankments constructed for the purpose of electricity generation and can be extremely hazardous. In this regard, ESB cannot allow open public access due to issues of public safety, site security and operational requirements as these elements are an integral part of an active Power Station. However, the current 6km Blessington Greenway has been operating successfully for a number of years and in conjunction with Wicklow Co. Co. we will continue to work to deliver the extended loop around the entire reservoir in line with CPO 18.11 contained in the Wicklow CDP. The development of these beneficial community amenities has been possible because issues such as ownership, maintenance, impact on station operations and liability for the proposed activities have been successfully addressed.

In this regard, ESB grant access for the use of its lands where appropriate by;

- legal agreement which indemnifies ESB and controls the type of activity,
- providing access to responsible bodies or organisations which have a particular interest or knowledge of a specified activity, and,

- use of appropriate locations where activities can be carried out in a safe manner and do not impact on the operations of the Hydro Scheme.

Access to ESB lands under licence is granted to organisations that have the expertise to manage and control their activities and can indemnify ESB from any liability associated with such activities. In this context, we support objectives in relation to the extension of the Blessington Greenway.

2.3 Telecommunications

The provision of high-quality telecommunications infrastructure is a key element to attracting investment and sustaining economic growth in the Blessington Town area. As economic growth is a key factor for consideration in the pre-draft Blessington LAP, consideration to the telecommunication infrastructure of the town should be explored.

ESB supports the approach that to facilitate the provision of telecommunications services at appropriate locations the applicant must demonstrate compliance with national guidance. ESB encourages that the Draft LAP should recognise that applications for telecommunications development shall be consistent with the updated guidelines (PL 07/2012) that facilitate the improved development of telecommunications infrastructure and promotion of a policy of co-location.

ESB encourages policies consistent with the Department Circular to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.

2.4 Sustainable Transport & Electric Vehicles

The preparation of a LAP offers the opportunity to ensure that promoting policies at County Development Plan level are implemented in the Local Plan. ESB welcome all initiatives to increase the rate of provision of charging points for electric cars as set out under CPO 12.7 & 12.8 in the Wicklow County Development Plan 2022-2028.

There are currently over 85,000 EVs and Plug-in hybrids registered on Irish roads, so while the number has improved, the pace of uptake must increase over the coming years to achieve our fleet electrification targets. ESB welcome all initiatives promoting charging infrastructure, however, it is very important to note that the EU Energy Performance of Buildings Directive calls for an **increase to 20%** for the number of parking spaces which should have provision for electric vehicle charging infrastructure. In preparing the new LAP, an opportunity exists to ensure availability is expanded, in line with the new directive so that the LAP is consistent with National and Regional Policy and the Wicklow CDP in relation to the provision of electric vehicle infrastructure over the lifetime of the new LAP.

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, 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 Local Area Plan includes clear policies in relation to:

- Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the level of operational activities ongoing at our high-voltage substations within Blessington are protected.
- ESB supports the extension of the Blessington Greenway. ESB cannot allow uncontrolled public access to our lands at Pollaphuca Reservoir due to issues of public safety, site security and operational requirements. ESB grant access for the use of our land by legal agreements which allow for the control of water levels by ESB to facilitate electricity generation, water supply, fishing etc. ***Where access is granted for recreational activities, it is at selected locations deemed suitable for specific activities.***
- ESB supports the retention of the existing Land Zoning Objective AG-RB, to provide a 100m buffer from the Pollaphuca Reservoir to protect the physical and visual amenity of area.
- Recognising the opportunities for early engagement with ESB in relation to the design and delivery of new roads, public realm upgrades or the delivery of public greenways and the provision of ducting/underground cabling.
- Promoting, encouraging, and facilitating the use of sustainable modes and patterns of transport, including electric vehicles, with appropriate 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,



Keith O'Brien | Spatial Planner | Group Property | Engineering & Major Projects | ESB
[Redacted] | www.esb.ie
27 Fitzwilliam Street Lower, Dublin 2, D02 KT92