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CNPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0

31 March 2017

Re: Ireland 2040 National Planning Framework Issues and Choices Public Consultation

Dear Sir/ Madam

ESB welcomes the initiative by the Department of Housing, Planning, Community and Local Government to develop a National Planning Framework and is pleased to have this opportunity to input into this phase of the consultation process on what will be a very important part of national policy.

The consultation paper is comprehensive and takes a wide view over a long time horizon. It is also strongly evidence-based and seeks as wide an engagement with the public as possible. We believe this is a very good base from which to develop a durable framework that will serve the country well into the future.

Our submission

ESB's submission is organised as follows: there is an overview setting out the context for our response within our area of interest and the parts of the proposed framework that will touch on it. This is followed by specific answers to those consultation questions that lie within our expertise.

Overview

As the energy system touches all Ireland's homes and businesses Ireland, it is an intrinsic and crucial part of the spatial planning landscape. The Government objective of a low carbon energy system is required to meet Ireland's international commitments but it is also essential for the health and quality of life of its citizens. As has been seen in other jurisdictions, expanding today's high carbon energy system for an increased population would be incompatible with these goals. In addition, the mechanisms in the Paris agreement are likely to increase the pace of change required. For these reasons, the low carbon energy system must be central to the Planning Framework, not just an ancillary consideration. To give this effect, the action plans that will evolve from the National Mitigation Plan and the expected Heat Strategy should be an intrinsic part of the Planning Framework.

Ireland is in a relatively unique position in being an advanced economy but still a developing country. Because of our relatively late development and history, we have a still-developing infrastructure, strong population growth, and a unique greenhouse gas emissions profile. All of these factors combine to pose a challenge unlike that faced elsewhere in Europe or by most of the advanced economies of the world. With the fiscal constraints inherited from the recent financial crisis this means that intelligent, long-term planning is critical for Ireland's economic well being and the quality of life of citizens. The decision to develop a National; Planning Framework is timely.

From the perspective of energy, reducing carbon dioxide emissions in a way that maintains affordability and security of supply is the critical issue. The energy white paper in December 2015 described the climate challenge in particular in these terms: 'A radical transformation of Ireland's energy system is required to meet climate policy objectives'¹. ESB believes that low carbon must be tightly integrated with our planning processes in order to achieve this. Further, we believe that this transformation is essential to meet the quality of life considerations set out in the issues and choices paper. Air quality is a major cause of asthma and respiratory issues. The health impacts of particulate matter - the small particles from diesel exhaust or domestic burning of wood – are not yet fully understood but concerns are mounting among health experts. Cities such as London and Paris are taking radical steps to eliminate emissions simply for reasons of health. Eliminating emissions – especially from new buildings and vehicles – must be integral to our planning rather than just a key consideration.

To give this effect, we suggest that the National Mitigation Plan and the associated evolving roadmaps need to be part of the planning framework. The White Paper called for a National Heating Strategy. We suggest that this be developed based on a detailed national heat map, similar to that completed for Dublin, indicating for example the areas designated for district heating and cooling. The resulting heat strategy should also be part of the planning framework. This would enable sources of waste heat, such as data centres and users of heat, to be located within or these zones.

National Planning Challenges (Chapter 2)

We agree with the objective of a statutory document, approved by the Oireachtas and backed by Government. In addition, we suggest that there should be a broad base of consensus across the Oireachtas so that the policy direction will endure and avoid being the subject of contention later on.

People's Health and Wellbeing (Chapter 3)

ESB agrees with the list of considerations to move away from 'business as usual' as presented under the heading: 'Where to next?' (p21). We would point out that four out of the seven considerations touching on health, quality of life, travel alternatives and reduction of car dependency are all integral to the necessary transformation of the energy system.

A Place making Strategy (Chapter 4)

4.3 What are the solutions to maintain population in those rural areas where decline has been experienced?

We suggest that a key enabler would be to integrate the National Broadband Plan within the framework.

4.5 How can the goals of the integrated Marine Plan be spatially represented in a National Planning Framework?

We suggest that the Offshore Renewable Energy Development Plan – possibly via the Integrated National Energy and Climate Plan under the Energy Union - be integrated into the National Planning Framework.

¹ Energy White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030. (DCCA, 2015)



Ireland's Unique Environment – Sustainability (Chapter 5)

As mentioned above, we believe that a low carbon energy system must be an intrinsic part of a National Planning Framework rather than something that the Framework can assist with (5.2.6, p43).

The fact that the settlement pattern has a direct impact on the affordability of energy is well made. This is a choice for Government, planners and ultimately the citizens; it is useful that these decisions will be informed ones (5.3.3, p44).

Key Questions:

- 5.3 How do we plan for growth in such a way that supports a transition to a low carbon and climate resilient economy and what planning policy measures are needed to achieve this?

We suggest that the action plans derived from the National Mitigation Plan be incorporated into the National Planning Framework. Ensure that any new energy infrastructure and buildings are compatible with a 2050 low carbon energy system aligning with the national policy objective on climate.

- 5.4 What strategic energy infrastructure is needed to support the economy and society and realise the transformation of Ireland's energy system to meet climate change and energy obligations and in what areas should it be located?

Necessary transmission infrastructure to maintain a secure and stable electricity grid of adequate capacity to provide for planned growth around the country. Under the regulatory model, infrastructure is developed in response to demand and not in advance of demand.

Carbon capture and sequestration infrastructure. See 6.1 below.

- 5.6 What measures should be implemented in order to safeguard our landscapes, seascapes and heritage and ensure that Ireland continues to be an attractive place to live, visit and work?

Eliminate emissions from all new buildings. Confine combustion to regulated sites such as distributed and central generating sites or district heating energy centres so they can be transitioned to low carbon alternatives. Plan for a 100% electric car and light commercial vehicle fleet. This together with modal shift, will ensure a high air quality in our cities and towns. Zero emission, airtight homes with forced ventilation will eliminate cold drafts and dampness, minimising respiratory ailments and prolonging the lives of our elderly and fuel poor.

Equipping Ireland for Future Development – Infrastructure (Chapter 6)

Key Questions

- 6.1 What are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years?

Modelling of the low carbon energy system in 2050 suggests that Ireland's electricity will be generated from a combination of wind, gas with carbon capture and sequestration and some biomass, possibly with combined heat and power. Carbon capture and sequestration infrastructure consists of pipelines and a suitable geological site such as an exhausted gas field. For economic reasons, CCS infrastructure is likely to be shared between several generators. It is essential that planning for carbon capture and sequestration infrastructure commences now and the necessary legal and regulatory frameworks are put in place in the near term.

6.2 What do we need to do to make best use of existing infrastructure?

We suggest that, over the timescale to 2040, the best overall options for the long term need to be taken.

6.3 How can we ensure that ensure that the provision of infrastructure can be planned to match future demand and how can the NPF reflect this?

It will be important that planning is integrated. For example, the action plan arising from the National Mitigation Plan and the future heat strategy need to be part of the NPF. Please note also the comments under 5.4 above.

6.4 How can capital spending on new infrastructure be sequenced in a way that is affordable and equitable, while taking account of Ireland's Climate Change obligations?

Firstly we suggest that long life assets should not be planned unless they are compatible with a 2050 low carbon future. It is generally feasible to accurately predict which assets will be required while the exact timing of their being required can vary depending on economic cycles. We recommend planning infrastructure far in advance, incorporating it into planning and zoning while making sure to commit capital as late as possible so the asset is in place just ahead of when it is needed.

Enabling the Vision – Implementing the National Planning Framework (Chapter 7)

Key Questions

7.1 When it comes to implementation and monitoring of the NPF, are there common goals that can be identified and apply to every place?

From an energy perspective, alignment with the National Transition Plan and Heat strategy as well as the National Adaptation Plan are examples of common goals.

7.5 What the key indicators for measuring the successful implementation of the NPF?

Key indicators would be that coherent supporting plans and strategies (such as roadmaps under the National Transition Plan and Heat Strategy) are in place and the degree of alignment and integration between local plans and supporting plans.

The consultation paper points out that some 20% or more of our housing in 2040 doesn't exist today. Much of the Ireland of 2040 is yet to be built. There is the opportunity to plan this in a way that facilitates value for money in utility costs and designs out greenhouse gas emissions while designing in the quality of life elements highlighted in the paper. ESB has been looking at the climate and energy challenges and believes that this is achievable.

We hope these comments are helpful. We would be pleased to engage in any discussion on the thoughts above should it prove helpful. We intend to fully engage in the future consultations and look forward to the evolution of the framework.

Yours Sincerely



John Lawlor

Regulation Manager