



Energy for  
generations

ESB Group Property

# Issues Stage – Athlone Joint Local Area Plan 2024-2030

Submission on behalf of ESB to the Athlone Joint Local Area Plan 2024-2030 Pre-Draft Public Consultation Strategic Issues Paper.  
16/01/2024



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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 (Joint LAP) for Athlone Town. ESB is a landowner and employer in Westmeath and Roscommon with property and infrastructural assets throughout each 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 Joint LAP to provide a robust forward-facing framework to guide development, quality planning outcomes for Athlone and its hinterland over the life of the plan to 2030. We recognise the Joint LAP will be a functional planning policy document that will guide development, in line with an implemented vision, for how the urban space of Athlone Town should grow and evolve into a sustainable resilient town, targeting key issues around residence, employment, community, tourism, leisure and recreation, culture, and education. Outlined below are observations regarding strategic issues that should be taken into consideration in the preparation of the Draft Athlone Joint Local Area Plan 2024-2030.

## 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 can deliver 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 923MW of green energy generation connected to the grid.

ESB is embracing innovative 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 Regional Assemblies.

## 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 Westmeath/Roscommon 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 2022 over 50,000 new residential and business connections were completed, along with the installation of over 1.1 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 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 2023.

## 2. PLANNING POLICY & PROPOSED DRAFT JOINT LAP

In reviewing the Pre-Draft 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 the Town. ESB acknowledges that the process of preparing a new Joint 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 NPF identifies Athlone as a Regional Centre, and this reflects the town's strategic central location in Ireland combined with the scale and regional influence of Athlone Town. As a Regional Centre, Athlone has been identified as having the current capacity and future significant growth potential to act as a regional economic driver for the wider region. ESB will work to support the delivery of key development parameters that will guide the strategic growth.

Among the most critical measures in the Government's Climate Action Plan is that 80% of electricity will be generated by a mix of 5 GW offshore wind, 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.

### 2.1 ESB Depot, Garrycastle, Athlone

ESB Networks provides an essential service building and maintaining the electricity networks in Athlone and throughout Co. Westmeath and Co. Roscommon. It is responsible for constructing all the sub-transmission, medium and low voltage electricity network in the county and for managing this infrastructure which is owned by ESB.

ESB has several critically important locations across the Region 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 Regulation of Utilities (CRU) 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.

ESB's Depot at Athlone is required to support the delivery by ESB of capital works programmes and operational activities in an energy efficient and cost-effective manner where key performance targets and emergency response times can be delivered. 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 Athlone and the wider area. Located in close proximity to the N6 in the east of the town, ESB supports Land Use Zoning appropriate to established existing use, whilst also accommodating of future development on the site to facilitate expansion of statutory works in the future. ESB requests an appropriate Land Use Zoning Objective be applied to the ESB Depot in Garrycastle, Athlone.

### 2.2 Electricity Generation, Transmission & Distribution

Both the NPF, the relevant RSES documents for the Region, along with the Westmeath/Roscommon 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 inclusion of 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 and Westmeath/Roscommon Co. Co. Early engagement at design stage of key public infrastructure projects, 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 Athlone to ensure input from ESB Networks at an early stage of project design.

At present the electrical load of Athlone Town is served by 1 no. 38kV and 1 no. 110kV Stations located along the N6/M6 on the south-western fringe of the town, in Co. Roscommon, and 2 no. 38kV Stations located in Garrycastle, in Co. Westmeath.

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.

## 2.3 Telecommunications

The provision of high-quality telecommunications infrastructure is a key element to attracting investment and sustaining economic growth in Athlone Town. As economic growth is a key factor for consideration in the pre-draft Athlone Joint 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 Plan 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 Joint 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.



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 particularly 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 Joint LAP, an opportunity exists to ensure availability is expanded, in line with the new directive so that the Joint LAP is consistent with National and Regional Policy in relation to the provision of electric vehicle infrastructure over the lifetime of the new plan.

### 3. CONCLUSION

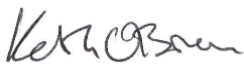
Investment in infrastructure is crucial to the economic and social well-being of our country. Such investment creates jobs, stimulates economic activity, and provides modern, efficient facilities to provide the services that people need including healthcare, education, and community services amongst 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 ESB Networks Depot at Garrycastle, Athlone.
- 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,



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