



Forward Planning,
Economic Development and Enterprise Directorate,
Limerick City & County Council,
Merchants Quay,
Limerick.

11th April 2022

Re: Draft Limerick City and County Development Plan 2022-2028 – 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 Limerick City and County Council for submissions to the Draft Limerick City and County 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 submission to the Draft Limerick City and County 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

As recognised throughout the Proposed Material Alterations report and particularly by Proposed Amendment No. (67), 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.

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 the Proposed Amendments below.

Proposed Amendments No's. 40 & 41 – Chapter 5: A Strong Economy

The emergence of opportunities to exploit offshore energy potential have developed significantly in recent years and will continue to do so as technology advances in this sector. As outlined in Proposed Amendment No. 40, the National Marine Planning Framework will deliver a new spatial system for the designation of marine zones for offshore energy.

ESB's Brighter Future Strategy sets out a major aspiration to develop in excess of 2GW of offshore wind in Ireland and the UK by 2030. Already, we are working on developments in the Atlantic, off the west coast. Moneypoint Offshore Wind Farm is ESB's flagship floating offshore wind development project proposed in Ireland. If developed, the project will be delivered in two phases. The first phase, Moneypoint Offshore One, is located 16km off the Clare/Limerick Coast. The expected capacity from the first phase is estimated to be 400MW with the final wind farm area likely to be in the order of 70km². The second phase, Moneypoint Offshore Two would be located a further 20km west of Moneypoint Offshore One, taking the total project capacity to between 1GW – 1.5GW. The latter phase would have a likely area of 180km².

The creation of a new industry presents a major opportunity for economic growth on the western seaboard and the Shannon Estuary has the potential to be at the centre of that development. The construction of such facilities can become the catalyst for the creation of a broader offshore wind enterprise zone which can be a major employment centre for the region. In this regard, we welcome Proposed Amendment No. 41 that adds to existing Objective ECON O45 in the promotion of Offshore Renewable Energy projects.

Proposed Amendment No. 62 – Chapter 8: Infrastructure

ESB supports the promotion of energy infrastructure objectives and submit that they must continue to protect the County's future capacity for the development of energy generating, processing, transmission and transportation infrastructure whilst encouraging the sustainable development of the County's renewable energy resources. In this context, we note the inclusion of Part g) to Policy Objective IN O11 *Energy and Gas Network* and the requirement to consider the strategic function of the national road network when delivering electricity transmission and distribution infrastructure.

The provision of a secure and reliable electricity transmission infrastructure and transmission grid is essential to meet the growth in demand and ensure that a reliable electricity supply is available. Limerick has a very strong electrical grid and substation network, and this system will be instrumental in supporting the development of the renewable energy industry in the county.

Proposed Amendment No. 73 – Chapter 9: Climate Action (Renewable Energy Targets)

We welcome the addition of the table, *Renewable Energy Targets*, under Proposed Amendment No. 73. In line with the requirements of Section (1C) of the Planning and Development Act 2000 (as amended) it is proposed to include the targets into the plan. The targets identify the quantum of renewable energy to be developed in the County to ensure Limerick City and County contribute to the delivery of national renewable energy targets.

Proposed Amendment No. 74 – Chapter 9: Climate Action (Solar Energy)

ESB support Proposed Amendment No. 74 that includes additional text in support of utility scale solar projects. This is welcomed as no single renewable energy technology will deliver Ireland's transition to a low carbon economy but rather a diverse range of technologies will be required. It is predicted that solar will play a significant role in reducing greenhouse gas emissions and thus provide environmental benefits whilst also being complimentary to economic growth. Mapping for solar irradiation illustrates that Limerick ranks highly in terms of solar resource in Ireland. There has recently been a significant decrease in the cost of solar PV panels and this technology should offer possibilities for increased development of solar energy for electricity generation in the county.

Proposed Amendment No. 75 – Chapter 9: Climate Action (Life Extension & Repowering)

In our Draft Submission we welcomed the plan led approach of Limerick City and County Council in relation to Wind Energy Developments that is consistent with national guidance. However, we did highlight that

there was an opportunity to strengthen the plan with the inclusion of support for the life-extension and repowering of existing wind farms. This entails extending the planning lifetime of existing windfarm with no or minimal new development. Well-maintained windfarms and associated plant can operate safely after a planning expiry date of 20-30 years. Existing wind farms have the benefit of acceptance by local communities and contribute economically to the County through the payment of rates and community benefit funds. Therefore, we welcome the inclusion of the new Objective CAF OXX in Section 8.5.4 *Wind Energy* as follows:

Objective CAF OXX Life Extension and Repowering of Wind Farms

"It is an objective of the Council to support the life-extension and repowering of existing wind farms, where considered appropriate and subject to an appropriate level of environmental and planning assessment."

Proposed Amendment No. 76 – Chapter 9: Climate Action (Combined Heat & Power)

Notwithstanding the Government's aim to increase the percentage of electricity generation from renewables to 80% by 2030, the contribution from non-renewable sources will still consist of 20%. Furthermore, on dull still days or nights, almost all electricity may sometimes need to come from non-renewables generation.

At Draft Stage we highlighted that the requirement for renewables-enabling plant was not acknowledged in the Draft Plan. Given that Limerick City & County has access to Gas Network, the inclusion of the text below as part of Proposed Amendment No. 76 is welcomed.

"It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand."

Proposed Amendment No. 103 – Chapter 11: Development Management Standards (EV Charging Provision)

The Proposed Amendment aims to strengthen the existing Limerick City and County Council policy of promoting electric vehicle charge points. ESB welcome the above initiatives to increase the rate of provision of charging points for electric cars.

There are currently over 45,000 EVs 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. Since our submission to the Draft Plan last year, there has been a change in standards required for EV charging infrastructure. 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 and sets out standards for various developments. In preparing the final CDP, an opportunity exists to ensure availability is expanded, in line with the new directive so that the County is consistent with National and Regional Policy in relation to the provision of electric vehicle infrastructure over the lifetime of the new plan.

Therefore, to ensure that the Limerick City and County Development Plan increases capacity for the usage of electric vehicles to the levels required, we request that the standards as set out in Statutory Instrument No. 393/2021 – *European Union (Energy Performance of Buildings) Regulations 2021* are fully implemented. The standards in Table 1 below are consistent with the above Regulation and should be considered to further amend Chapter 11: *Development Management Standards*, Section 11.8.6 *EV Charging Points* in the final plan.



Development Category	EV Charging Points
Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces).	A minimum of 1 EV charge point space per five car parking spaces (ducting for every parking space shall also be provided)
New dwellings with in-curtilage car parking.	Installation of appropriate infrastructure to enable installation of recharging point for EV's.
Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g., office developments)	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV Charging Point.
Developments with publicly accessible spaces (e.g., supermarket car park, cinema etc.)	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV Charging Point.

Table 1. Proposed EV Charging Point Standards

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 Maritime Area Planning Bill 2021 and the reinforcement of support for marine energy solutions, for the repowering of existing wind farms, solar farms and renewables-enabling plant at suitable locations are welcomed.
- ESB support the further amendment of Section 11.8.6, *EV Charging Points*, to ensure the implementation of the latest standards consistent with S.I. No. 393/2021. This will support the extension of charge point infrastructure to ensure it becomes a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars.

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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