Energy for generations

Planning Department,
Leitrim County Council,
Áras an Chontae,
St. George's Terrace,
Carrick-on-Shannon,
Co. Leitrim,
N41 PF67

Emailed to cdp@leitrimcoco.ie

23rd November 2022

Re: Draft Leitrim County Development Plan 2023-2029 – 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 Leitrim County Council for submissions to the Draft Leitrim County Development Plan 2023–2029, Proposed Material Alterations.

While this submission is confined to the Proposed Material Alterations, its content is in the context of our earlier submissions to the Draft Leitrim County Development Plan 2023–2029. 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

ESB welcome Proposed Amendments MA 84 and MA 148, that recognise the updated Climate Action Plan 2021 and proposed to replace references to earlier versions. As the amended Section 12.2.3 will reflect, 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.MA 85, MA 86 & MA 87 – Ch. 12 Climate Action & Renewable Energy

As outlined in our earlier submissions, ESB owns and operates the Garvagh Glebe Wind Farm, located within the Corrie Mountains in Arigna, Co Leitrim, about 8km west of Drumkeeran village. The wind farm features 13 turbines with a combined generating capacity of 26 MW.

As mentioned above, the contribution of wind energy and repowering areas will play a key role in the delivery of the National Climate Action Plan targets. It is important in the final determination of the Development Plan that full regard is taken of all national guidance and the evidence-based approach to the preparation of wind energy area maps.

The proposed additional text in Section 12.6.2 is noted, it provides further clarity with regard to the methodology employed in the preparation of the Renewable Energy Strategy (RES) and most particularly the Wind Opportunities and Constraints Map. We acknowledge that the figures provided in table 12.3 do not represent a '*ceiling'* or '*cap'* on the potential renewable energy that can be generated in the county up to 2030 and welcome the recognition that:

> *"The Plan notes the provisions of Action 102 of the Climate Action Plan 2021 which includes an objective to develop a new spatial policy for large scale wind and solar development, in support of the target to increase the share of electricity demand generated from renewable sources to up to 80% and that this will be implemented through a regional planning initiative. When implemented, this will give counties like Leitrim the platform to review and if necessary, revise upward the renewable electricity targets contained in this draft plan."*

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.

Proposed Amendment MA 98 – Ch. 13 Development Management Standards

ESB welcome the above proposed amendment that aims to strengthen the existing Leitrim County Council policy of promoting electric vehicle charge points by increasing the rate of provision of charging points for electric cars.

Through MA 98, it is proposed to set the rate at which EV Charging points are provided, to 20% of the total car parking spaces in each development. Through this increase Leitrim County Council has incorporated the latest standards for the provision of EV Charge points as set out in S.I. No. 393/2021. The implementation of the latest standards will facilitate growth in 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.

The above standards or similar have been implemented in the latest review of development plans by planning authorities in Ireland. Promoting policies and objectives are facilitating growth in charge point infrastructure, to become 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.

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 reinforcement of support for renewable energy soltions are welcomed.

- ESB support the amendment to the plan that introduce policies for EV Charging infrastructure 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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