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Draft Clare County Development Plan 2023-2029,
Planning Department,
Clare County Council,
New Road, Ennis,
Co Clare.

Email: devplan@clarecoco.ie

25th March 2022

Re: Submission on the Draft Clare Development Plan 2023 - 2029

Dear Sir / Madam,

This submission has been prepared by HRA Planning Chartered Town Planning Consultants DAC on behalf of Shannon Foynes Port Company (SFPC) and seeks to build on the submission made at pre-draft plan stage.

SFPC acknowledges the work of the planning authority in preparing the Draft Plan and in particular welcomes Chapter 12 which recognises the national and international importance of the Shannon Estuary, its potential to attract multinational development and the significant work that has been undertaken to progress its promotion and development. SFPC further acknowledges the ambition in the Draft Plan for County Clare to become self-sufficient in renewable energy, as set out in the Clare Renewable Energy Strategy (RES) 2023-2030.

1.0 The Role of SFPC

Notwithstanding the challenges faced by other sectors in the region, not least those created by the Covid 19 pandemic, SFPC is well placed to harness the opportunities presented on the Shannon Estuary and to provide the region with substantial opportunities in the years ahead, including opportunities to rebalance the freight national supply chain and / or facilitating the harnessing of the Atlantic coast's immense renewable energy resources. As a strategic asset of regional, national, and European importance,



underpinning regional development, continued support not only of the Shannon Estuary, but also SFPC is essential from both a policy and funding perspective.

Whilst the Draft Plan correctly recognises the national and international importance of the Shannon Estuary, there is some concern that SFPC's statutory role and purpose as a port of international and national significance is not acknowledged in the Draft Plan

SFPC has statutory jurisdiction and responsibility for all commercial maritime activities on the Shannon Estuary. This includes regulating all pilotage, ship movements and marine safety, as well as maintaining and developing port infrastructure, handling equipment, landside storage and distribution facilities. The Shannon Estuary, as acknowledged in the Draft Plan, has a number of substantial deep-water facilities. Six of these facilities are under the authority of SFPC each with significant adjoining land banks with access to the high voltage electricity network and gas supply. These facilities include the general cargo ports at Foynes and Limerick Docklands as well as the single user jetties at Moneypoint, Tarbert Island, Aughinsh and Shannon Airport Aviation Fuels Jetty.

It should be noted that SFPC's Tier 1 and Ten-T Core Port designations includes all ports and jetties under the management of SFPC, including facilities in Co. Clare. It is thus respectfully requested that SFPC's role as a port of international and national significance is acknowledged in the Draft Plan including its Tier 1 status at National Ports Policy level and TEN-T Core Port status at a European level which seeks to promote connectivity within Ireland and throughout Europe.

2.0 Recognition of Vision 2041

SFPC welcomes Objective CDP11.23 in the Draft Plan which states that it is an objective of Clare County Council:

- a. To support the continued expansion of Shannon Foynes Port in compliance with the environmental requirements of Objective CDP3.1 as it applies to Co. Clare; and*
- b. To support the capital infrastructure projects in the Shannon Foynes Port Company Infrastructure Development Programme.*

Whilst recognition of SFPC's Infrastructure Development Programme is to be welcomed, it is requested that Objective CDP11.23 is broadened to specifically reference its 30-year masterplan, Vision 2041, as currently supported in the Draft Limerick Development Plan 2022 – 2028.

Vision 2041, prepared in the context of and under the framework of the SIFP, includes initiatives for the wider Estuary including safeguarding the roles and functions of the Strategic Development Locations; accommodating larger ships; safeguarding deep water channels; facilitating the sustainable growth of deep draught berths, quayside infrastructure and cargo handling facilities. SFPC's access to deep water in the Shannon Estuary means that its investment plans under Vision 2041 will enable the port to handle Panamax and post-Panamax-sized vessels.

Whilst Section 12.3 of the Draft Plan acknowledges these requirements to ensure that shipping on the Shannon Estuary continues to make a significant contribution to the national and regional economy, Objective CDP 12.7 makes no reference to the role or purpose of SFPC in delivering these initiatives, nor does it acknowledge the framework for delivery of these initiatives as set out in Vision 2041.

There is adequate support and policy at international, national and regional level to provide a suitable policy basis to ensure that investment in existing and future ports on the Shannon Estuary can be realised. This can be achieved by recognising and promoting Vision 2041 as the framework guiding SFPC's capital infrastructure projects.

3.0 Off-Shore Renewable Energy (ORE)

The Draft Plan supports the wider plans of Shannon Foynes Port to make the Shannon Estuary a focal point for the offshore wind industry in Europe. This is very much welcomed. Further, Objective CDP12.8 supports ORE by seeking to ensure that the Shannon Estuary fulfils its optimum role in contributing to the diversity and security of energy supply and seeks to harness the potential of the Estuary for the sustainable development of renewable energy sources to assist in meeting renewable energy targets.

However, Section 12.2.2.2 of the Draft Plan appears to solely focus on the potential of Moneypoint to develop as a 'Green Energy Hub' with potential to deliver a Wind Turbine Construction Hub, an Offshore Floating Windfarm, Hydrogen storage and generation, amongst other things. Whilst such an initiative on the Estuary is to be welcomed and is supported, SFPC has concerns with the single focus placed on one Strategic Development Location (SDL), particularly when SIFP identifies 6 no. potential sites on the Estuary.

SFPC considers that the Estuary must be promoted in a holistic manner, as one destination with significant potential to become a world class leader and major contributor to renewable energy generation and transmission. Together, a collective and clear message must be sent, that the Estuary is 'open for business' to support ORE resources and potential. In this regard, it is considered that Moneypoint should not be promoted over and above any other SDL site on the Estuary. To harness the potential of the Estuary for the sustainable development of renewable energy sources and to support and develop some 70,000MW of ORE around the coast of Ireland, a number of potential sites on the Shannon Estuary may require strategic investment and an upgrade of facilities. To focus on and promote one site, in a statutory development plan, over and above other potentially suitable sites in the Estuary could inadvertently compromise the development of such sites, particularly if they are not given equitable or similar support through policy promotion.

The global move to address climate change creates an unprecedented growth opportunity for the Shannon Estuary. The natural deep-waters of the Shannon Estuary, making it ideal for industry, combined with what are among the world's most reliable winds off the west coast, is creating the perfect opportunity for the region to become a marshalling port

energy hub facilitating offshore floating wind development. Such an opportunity is more than just one site.

In addition, SFPC aims to support the production of alternative renewable fuels such as green hydrogen and green ammonia from floating offshore wind for local and national use and for export to Europe and further afield.

In 2020, the European Commission launched a hydrogen strategy which will be central to the decarbonisation of Europe and have set out in its Roadmap that:

- From 2020 to 2024, the EU is targeting production of 1 million tonnes of renewable hydrogen, and 6 GW of renewable hydrogen electrolyzers, to decarbonise existing hydrogen production along with Carbon Capture and Storage (CCS). The policy focus is set to establish a “liquid and well-functioning hydrogen market and on incentivising both supply and demand”. Plans will also be developed for large wind and solar plants dedicated to renewable hydrogen production.
- From 2025 to 2030, hydrogen will become “an intrinsic part of an integrated energy system” with a target of 10 million tonnes of renewable hydrogen by 2030 and 40 GW of electrolyser capacity. Hydrogen will play a crucial role in balancing the electricity system by transforming electricity into hydrogen when renewable electricity is abundant. Local hydrogen clusters or “Hydrogen Valleys” will develop, initially relying on local production of hydrogen transported over short distances. The need for EU-wide logistical infrastructure will also emerge, with existing gas grids potentially repurposed for transporting hydrogen over long distances.
- By 2030, the EC will aim to establish an “open and competitive EU hydrogen market, with unhindered cross-border trade and efficient allocation of hydrogen supply among sectors”.

As of this week and in light of Russia’s invasion of Ukraine, The European Commission has announced joint European action through *REPowerEU* for more affordable, secure and sustainable energy to make Europe independent from Russian fossil fuels in advance of 2030. This accelerated action will see measures such as speeding up renewables permitting, decarbonising industry and importantly a hydrogen accelerator aimed at developing infrastructure, storage, facilities and ports and replacing demand for Russian gas with renewable hydrogen.

Considering the distinct competitive advantage of Ireland’s Atlantic floating wind resource, all the SIFP designated SDL sites on the Shannon Estuary have the potential to produce significant amounts of green hydrogen in support of Europe’s plans. The scale of our Atlantic wind resource means that a **multi site** approach on the Shannon Estuary **must** be adopted if we are to realise our national and European climate action objectives of 51% reduction by 2030 and net zero by 2050.

4.0 Logistics Hub

As raised in our pre-draft submission, SFPC aims to develop sites on the Shannon Estuary as a Logistics Hub is to initiate direct unitised shipping services from Foynes to Europe on the short sea and North America on the deep-sea routes. Such an initiative facilitates positive climate action by assisting in decarbonising the national supply chain

SFPC is well positioned to enter the multimodal freight market with the ability to offer viable services to a significant proportion of current unitised freight users. SFPC's viability regarding unitised freight is based on the following principles:

- Proximity to market – 75% of GDP is within two hours of Foynes Port and the Shannon Estuary
- Availability of land for storage and distribution centres – The SIFP identifies a number of SDL's with extensive landbanks and deepwater which are suitable to accommodate and function as a Logistics Hub.
- Foynes and the Shannon Estuary is located at an uncongested point in the national supply chain with excellent transport connectivity.
- Foynes port and the Shannon Estuary has available capacity for additional shipping and is relatively uncongested

SFPC's intention in the medium term is to encourage the location of distribution centres port side. Due to the advantage outlined above and with the consumer behavioural shift to online shopping the demand for these type of port facilities and logistic centres is in its infancy. Foynes has the potential to establish itself as a logistics hub similar to the logistic parks based in North Co. Dublin thereby giving rise to significant economic impacts and jobs for the wider Shannon Estuary.

It is therefore requested that the Clare Development Plan provides an objective supporting the development of a Port Centric Logistics Hub on the Shannon Estuary

5.0 Conclusion

The National Planning Framework (NPF) identifies the effectiveness of Ireland's ports and airports as being vital drivers of Ireland's competitiveness and future prospects. As noted in the National Ports Policy, *"the continued commercial development of Shannon Foynes Port Company is a key strategic objective of National Ports Policy"* and *"it is the Government's position that those ports considered to be of national significance must be capable of the type of port capacity required to ensure continued access to both regional and global markets for our trading economy"*.

It is within the context of these national and statutory documents that this submission has been made. The overall aim is to ensure that SFPC and its port facilities and assets, including those located in Co. Clare, are appropriately positioned to ensure continued access to both regional and global markets and enhance Ireland's trading economy

The support provided to SFPC by Clare County Council is very much evident in the Draft Plan. SFPC look forward to continue working with Clare County Council in the future and in particular in advancing proposals to realise the full potential of its assets throughout the Shannon Estuary.

Yours faithfully



Mary Hughes MIPI

Director HRA Planning chartered town planning consultants DAC