

Planning Department,
Clare County Council,
New Road,
Ennis,
Co. Clare.
V95 DXP2

Emailed to devplan@clarecoco.ie

03rd January 2023

Re: Proposed Amendments to Draft Clare County Development Plan 2023 - 2029

Dear Sir/Madam,

This submission by Electricity Supply Board (ESB), 27 Lower Fitzwilliam Street, Dublin 2, is in response to an invitation by Clare County Council for submissions to the Draft Clare County Development Plan 2023–2029, Proposed Amendments.

While this submission is confined to the Proposed Amendments, its content is in the context of our earlier submissions to the Draft Clare 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 the Proposed Amendment to Section 2.3.2, Chapter 2 *Climate Action*, that recognises Ireland's updated Climate Action Plan and the positive role the Just Transition approach can play in the implementation of our climate change response. 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 most recently revised Government's Climate Action Plan 2023 is that 80% of electricity will be generated by a mix of at least 7 GW offshore wind, 2 GW of which shall be earmarked for green hydrogen production, up to 9 GW onshore wind and 8 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 2023, the share of electricity from renewable energy increased more than six-fold between 2005 and 2020 – from 7% to 39.1%. 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 2021, wind and other renewable sources, hydro, solar and biomass accounted for 36% of demand. These are encouraging trends, but further acceleration of deployment is necessary to achieve the Government's revised targets 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 renewables 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, whilst utilising Ireland's significant wind resources to produce green hydrogen and ammonia. The use of excess renewable energy for the development of green

hydrogen and ammonia production along with associated storage facilities shall further supplant the use of fossil fuels in the system. To support the transition of the National Grid to a low-carbon future ESB is developing assets such as battery storage, synchronous condensers 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.

CH. 6, CH. 11 & Vol. 5 Renewable Energy Strategy
 - *Moneypoint & Shannon Estuary*

As outlined in previous submissions, ESB owns and operates Moneypoint Generation Station located near Kilrush, Co. Clare. The overall operational site area is 561 acres; the land area measures c.398 acres and the foreshore area is c.163 acres. Moneypoint Generating Station has an installed capacity of 915MW, and the adjacent Windfarm has 17MW installed capacity. Moneypoint continues to be strategically important in terms of capacity and security of supply through providing diversity in fuel supplies and providing critical energy storage in an increasingly volatile global energy market.

However, as Moneypoint nears the end of its operating life in its current configuration, ESB is planning, through its ‘Green Atlantic @Moneypoint’ project to develop more suitable low carbon generation technology to capitalise on the extensive Marine, Transmission, Distribution and ancillary facilities at this strategically important location. In this regard, ESB has recently commissioned a synchronous condenser and flywheel at Moneypoint. This technology provides increased kinetic energy to the transmission system that allows the system to operate securely and efficiently while facilitating higher levels of renewable non-synchronous electricity on the grid. We welcome the acknowledgement of this latest ESB development through the Proposed Amendment enhancing the supporting text in Section 9.4 of Vol. 5 - *Renewable Energy Strategy*.

The Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary identifies Moneypoint as a Strategic Development Location (SDL). This is further recognised in Chapters 9 & 12 and throughout the Draft CDP. ESB welcome the commitment from Clare County Council to support the ‘Green Atlantic @Moneypoint’ project and in so doing, safeguard future operations and proposed development at Moneypoint to ensure the efficient production of environmentally sustainable electricity and security/diversity of supply in the future while upholding the environmental integrity of the Shannon Estuary.

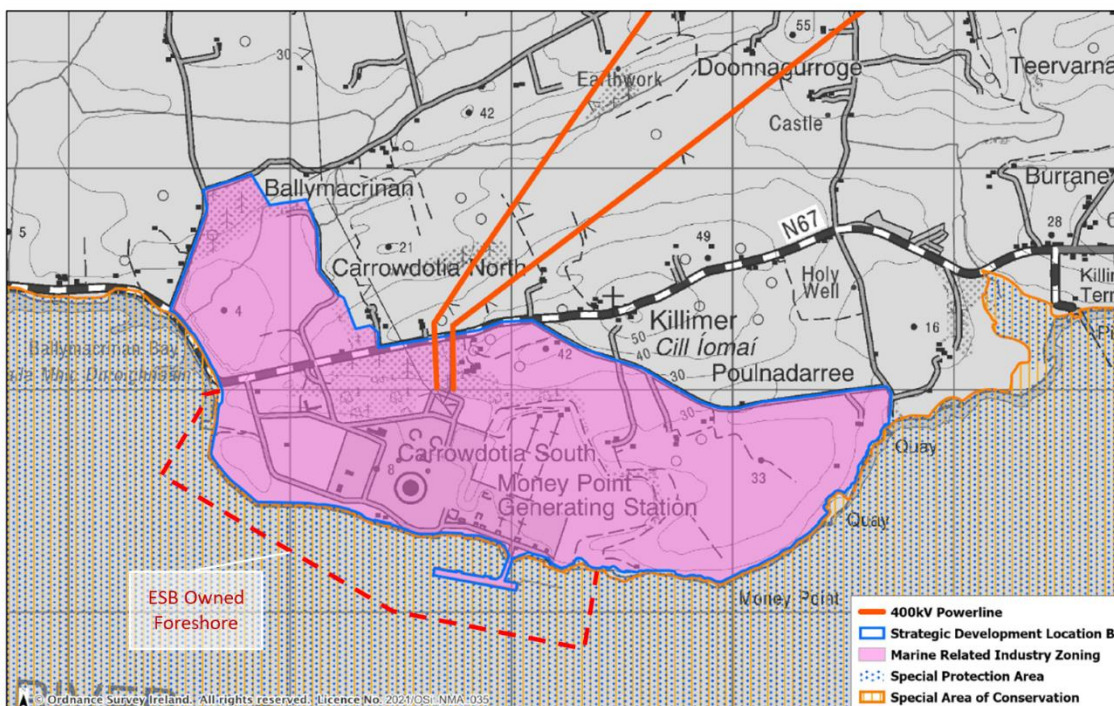


Fig. 1 Extract from Draft CDP – Map 12B with ESB Foreshore Area Displayed

Plan Objective CDP12.6, along with Map 12B *Strategic Development Location B* (Fig. 1 above), further underpins the support of Clare County Council to safeguard the role and function of Moneypoint as a key strategic location for the driver of economic growth in the Country. As displayed in the amended map above the operational footprint of the Moneypoint Station extends beyond the existing jetty area to include the Foreshore Area within ESB ownership.

In considering the future of Moneypoint we are guided by the need for the protection of this site, to ensure the continuation of core power generation, transmission and distribution functions and to ensure that future expansion requirements in this area are not compromised by inappropriate neighbouring land uses or activities. Furthermore, as emerging technologies evolve, ESB envisage further expansion into undeveloped SDL and adjacent lands. In this regard, ESB look forward to engaging in the upcoming review of the SIFP. In the interim, we welcome the Proposed Amendment to Section 6.15 of the Draft CDP, and the inclusion of additional text under *Availability of Land and Infrastructure*:

“Where proposals may arise for new employment and enterprise development in the open countryside, only where there are strong locational factors that would make the location of the use in towns and villages undesirable would these be considered by the Council on a case-by-case basis. Such proposals would include the development of commercial/industrial related facilities and associated support services in appropriate locations and any such proposals would be subject to the planning and environmental objectives as set out in this plan.”

ESB acknowledges support for transition to renewable sources at Moneypoint throughout the Draft Plan, most particularly Development Plan Objective, CDP 11.50 and in Section 9.4 of the RES, *ESB Moneypoint Clean Energy Hub*. It is important to highlight that the ESB landholding at Moneypoint will remain an important site for electricity generation and associated infrastructure into the future. It should be noted that as we manage the transition to more sustainable means of generation the existing plant at Moneypoint will continue to play an important role in providing a supply of stable energy output. This process will involve adjustments to the existing plant as it moves to the final stages of its life cycle and to a lower carbon operating profile. In this regard, ESB request that CDP 11.50 and Section 9.4 of the Draft Plan be reinforced by including the supporting text below to ensure that the transition to low and zero carbon energy at Moneypoint is successfully delivered.

“Clare County Council acknowledges that the transformation of the electricity sector to low and zero carbon generation may require interim arrangements whereby existing assets are permitted to operate at a lower carbon profile for specified durations, pending the delivery of additional renewable resources. Where such proposals are made, they will be favourably considered where they support energy generation and security; where they are demonstrably operating at reduced carbon intensity; where the duration of operations can be justified and where they comply with the policies and objectives of this Plan.”

CH. 6 - Economic Development & Enterprise

- 12.1 Environment

In progressing our plans at Moneypoint we are cognisant of our environmental obligations to uphold the integrity of the Natura 2000 Network. We acknowledge Proposed Amendment to Section 12.11 of the Draft Plan which aims to reinforce the protection afforded to the Shannon Estuary and its unique ecosystem.

CH. 6 - Economic Development & Enterprise

- 6.3 Regional Enterprise Plan to 2024 for the Mid-West

The Proposed Amendment to Section 6.3 *Regional Enterprise Plan for 2024 for the Mid-West*, is noted. We welcome the ambition of the Enterprise Plan to enable innovation across the region, including the action to establish a world class Marine, Renewable, Science and Climate Change Centre in Kilrush. Such an

institution can provide inclusive, immersive, enterprise focused education programmes to aid the development of the Shannon Estuary as a renewable energy hub.

Appendix 1 – Development Management Guidelines

- A1.2.3 Renewable Energy

Photovoltaic (PV) systems which produce electricity directly from solar radiation are becoming more widespread as their advantages become apparent and as costs fall. Solar projects will play a critical role in diversifying our renewable generation portfolio for the period out to 2030. Ireland is in a great position to take advantage of the significant reduction in the cost of solar energy over the past few years as the technology has advanced with the potential to provide a clean, diversified renewable electricity source for decades to come. Solar energy is suited to Ireland's climate, and we expect to follow the trend of other European countries and see increasing deployment of rooftop and grid scale solar energy. There is a strong correlation between wind and changing weather systems. In times of low wind there are often good solar conditions.

Mapping for solar irradiation illustrates that parts of Clare, particularly in the west of the County, rank highly in terms of solar resource in Ireland. In this regard, we welcome the support for the development of solar energy in the County as set out in the Draft Plan under Plan Objectives CDP2.18, RES 7.1 and RES 7.2. In the absence of national policy guidelines, Map 7.2 in the RES, provides guidance to developers for the development of solar farms. Proposed Amendment seeking to ensure that any pre-application discussion or planning application proposal for a utility-scale solar energy application in the vicinity of the strategic national road network shall include a Glint and Glare Assessment. ESB acknowledge that concerns about visual, amenity, health and safety need to be mitigated through the consultation process.

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 latest Climate Action Plan and the reinforcement of support for renewable energy solutions are welcomed.
- Managing the transition to more sustainable means of generation at Moneypoint will involve adjustments to the existing plant as it moves to the final stages of its life cycle and to a lower carbon operating profile. In this regard, ESB request that CDP 11.50 and Section 9.4 be reinforced by including supporting text in relation to interim operating arrangements pending the delivery of additional renewable resources.

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,



Colm Cummins | Group Property Planning Manager | Engineering & Major Projects | ESB
T: +353 1 702 6357 / [REDACTED] | www.esb.ie