

Frank Pentony,
Director of Services,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth
A91 W20C

28th July 2021

Re: Proposed Material Alterations to the Draft Louth County Development Plan 2021-2027

Dear Sir/Madam,

This submission by Electricity Supply Board, 27 Lower Fitzwilliam Street, Dublin 2, is in response to an invitation by Louth County Council for submissions to the Louth Draft County Development Plan 2021–2027 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 Louth County Development Plan 2021-2027. ESB welcome the proposed amendments that aim to reinforce climate change policies and wish to highlight opportunities to further strengthen the final plan, as a result of advancements in renewable technologies.

Proposed Material Alterations

Chapter 10 – Utilities

Proposed Alteration 138

The Draft National Energy and Climate Plan envisages a target of at least 55% renewable energy in electricity by 2030. In 2019, the Minister of Communications, Climate Action and Environment committed to raise the amount of electricity generated from renewable sources to 70% by 2030 in the Climate Action Plan with no generation from peat and coal. This ambition is needed to honour the Paris Agreement. 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. In this regard, we welcome the amendments to the text in section 10.5.2 of the Draft Plan and the acknowledgement from the Council that it has an important role to play in realising national targets through the inclusion of supporting policy objectives for renewable energy and the through the preparation of a Renewable Energy Strategy.

Proposed Alterations 140, 147 & 148

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. This is an encouraging trend, but further acceleration of deployment is necessary to achieve the Government's target for electricity of 70% from renewables by 2030.

In this regard, we welcome the alteration to Policy Objective IU 47 that commits to producing a Renewable Energy Strategy (RES) for County Louth within one year of adoption of the revised Wind Energy Guidelines. The RES will be important to establish the necessary baseline data and inform how Louth can meet its renewable energy targets in terms of wind energy resource.

ESB support the insertion of additional text to section 10.5.2.3 of the Draft Plan that outlines the vision for the proposed RES and how it aims to position the County as a leader in renewable energy generation,

supporting energy efficiency and conservation. In addition, the clarity provided by Alteration 148 to Policy Objective 51 is welcome and ESB support the updated text.

“To encourage the development of wind energy, in accordance with Government policy and guidance and the ‘Wind Energy Development Guidelines’ (2006) or any revisions thereof which may be issued during the lifetime of the plan.”

Proposed Alteration 155

Repowering can grant a new lease of life to existing windfarms 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 support Material Alteration 155 that proposes to insert a new Policy Objective in Section 10.6.1 of the Draft Plan.

“To support the repowering/life extension of wind turbines where appropriate and subject to normal planning considerations

Proposed Alterations 156 & 157

Both the NPF and the RSES contain promoting policies in relation to Energy Infrastructure and ESB fully supports the reinforcement of those policies at a local level that will accommodate the ongoing generation, transmission, and distribution of electricity. The continuing 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 support the insertion of new Policy Objective with Material Alteration 157.

“To seek to avoid the sterilisation of lands proximate to key public transport corridors such as rail routes when future energy transmission routes/pipelines are being designed and provided.”

ESB acknowledge the proposed re-wording of Policy Objective IU 70 and the insertion of new Policy Objective 156 that includes the introduction of the phrase *“where possible and appropriate”*. However, we wish to highlight that, Government policy recognises that public acceptability is required for the delivery of key networks projects and that to achieve public confidence project proposals must adhere to the highest international standards of safety, health and environmental and visual impact, and technology choice. The Government affirms that ESB Networks are obligated to adhere to all relevant guidelines and standards and they act in the national interest, and on behalf of all electricity consumers.

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. Louth has a very strong electrical grid and substation network and this network will be instrumental in supporting the development of the renewable energy industry in the county.

Conclusion

ESB, Ireland's leading electricity utility, 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 whilst encouraging the sustainable development of renewable energy resources.



Energy for
generations

- We welcome the commitment to produce a Wind Energy Strategy for the County within one year of adoption of the revised Wind Energy Guidelines.
- Repowering can grant a new lease of life to existing windfarms This entails extending the planning lifetime of existing windfarm with no or minimal new development. We welcome, the insertion of a Policy Objective to support the repowering/life extension of wind turbines.

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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