

Forward Planning,  
Mayo County Council,  
Áras an Chontae,  
The Mall,  
Castlebar,  
Co. Mayo,  
F23 WF90

26<sup>th</sup> April 2022

## Re: Draft Mayo County Development Plan 2021-2027 – 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 Mayo County Council for submissions to the Draft Mayo 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 Draft Mayo County Development Plan 2021–2027. 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

It should be noted that since the publication of the Draft Plan, 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 Amendment No's. CH 11.2, CH 11.5, CH 11.6 – Climate Action & Renewable Energy*

We welcome the proposed amendments above that include a commitment to review/amend the Mayo County Renewable Energy Strategy 2011-2022 within one year of the plan adoption. This updated commitment offers an opportunity to ensure consistency with National Guidelines and the provisions of RPO 4.16 and RPO 5.2(b) of the RSES for the Northern and Western Region.

*Proposed Amendment No. CH 11.19 – Climate Action & Renewable Energy*

We acknowledge that in line with the requirements of Section (1C) of the Planning and Development Act 2000 (as amended) the above amendment proposes to insert a new objective after REO 22, stating:

*“To support and facilitate the achievement of the minimum renewable energy target of 600MW for County Mayo over the plan, and to review/revise this target to ensure consistency with any future renewable energy strategies for the Northern and Western Region.”*

The targets identify the quantum of renewable energy to be developed in the County to ensure County Mayo contributes to the delivery of national renewable energy targets.

*Proposed Amendment No. DMS 4 – Vol. 2: Development Management Standards*

The Proposed Amendment aims to strengthen the existing Mayo 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.

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

Therefore, to ensure that the Mayo 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 above are consistent with the above Regulation and should be considered to further amend Volume 2: Development Management Standards, Section 7.12.1 Electric Vehicle Charging Points in the final plan.

## 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 additional commitment set out under various amended objectives in Chapter 11 Climate Action & Renewable Energy - to prepare a renewable energy strategy within one year of adopting the plan is welcomed. This updated commitment offers an opportunity to ensure consistency with National Guidelines and the provisions of RPO 4.16 and RPO 5.2(b) of the RSES for the Northern and Western Region.
- ESB support the further amendment of Section 7.12.1, *Electric Vehicle 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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