

Development Plan Submissions,  
Strategic and Economic Development,  
City Hall,  
Anglesea Street,  
Cork  
T12 T997

28<sup>th</sup> April 2022

## Re: Draft Cork City Development Plan 2022-2028 – Proposed 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 Cork City Council for submissions to the Draft Cork City Development Plan 2022–2028, 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 Cork City Development Plan 2022–2028. ESB acknowledge the overall ambition of the Draft Plan to reinforce climate change policies and we welcome the further emphasis on Climate Action through the proposed amendments. However, outlined below are observations regarding proposed amendments to land use zoning objectives impacting ESB lands at Marina and we request that these are taken into consideration in the preparation of the final CDP 2022 - 2028.

### *Proposed Amendment (Zoning) No. 2.14 – Part 2: Volume 2 (Mapped Objectives)*

As power generation operations at our Marina lands have been scaling down over recent years, ESB has been working in conjunction Cork City Council to deliver on their ambition to remove Seveso designated sites from Cork South Docklands. In this regard, ESB has been working to clear the lands south of Centre Park Road for development. ESB has also been liaising with the Land Development Agency (LDA) and others to unlock the regenerative potential of these lands as part of the first phase our overall regeneration plans for the Marina site. ESB's lands at Marina have been identified in the Governments *Housing for All* plan for transfer to the LDA. The role of the LDA is recognised throughout the Draft City Plan and further reinforced by the Proposed Amendment 1.50. which aims to insert a new Objective into Chapter 2 of the Plan:

*“Cork City Council, relevant stakeholder such as the Land Development Agency (LDA), will support and enable the development and renewal and regeneration of suitable state-owned lands as potential key deliverables to achieve NPF growth targets.”*

State lands, including ESB Marina, identified in *Housing for All*, chapter 3 – *Pathway to Increasing New Housing Supply*, have the potential to deliver up to 15,000 homes. However, due to the proposed phasing of remediation at ESB Marina, the lands south of Centre Park Road will become available for development first. In addition to the LDA other parties have also expressed an interest in this site. In this regard, proposed amendment No. 2.14, that involves the removal of *ZO – 02 New Res Neighbourhoods* land use zoning objective from ESB lands south of Centre Park Road hinders the delivery of critical housing and other potential development opportunities.

**ESB request the ZO – 02 New Res Neighbourhoods land use zoning objective be applied to the entirety of ESB lands south of Centre Park Road.**

The lands south of Centre Park Road contain, Marina Oil Tank Farm (former Seveso site), a critical ESB Telecoms communications tower and an area occupied by Gas Networks Ireland for a Bulk Gas Supply site. Significant investment is required to decommission this site which includes the former Seveso site and to

complete any necessary remediation measures to the required environmental standards. The land use zoning objective changes (Fig. 1 below) on our lands south of Centre Park Road from the 2015 Plan, through the current Draft Plan and Proposed Amendment No. 2.14 now inhibit this development as the financing of the decommissioning of the tanks and other infrastructure is directly linked to the redevelopment value of this portion of land. The proposal through Amendment No. 2.14 to rezone this area (4.8 acres) ZO 17 Sports Grounds & Facilities and (1.7 acres) ZO 13 Education places an inequitable burden on ESB as we endeavour to remediate our lands. ESB lands, in their entirety will accommodate substantial infrastructure that will service South Docklands and the wider Cork City area into the future. As part of a wider perspective on the South Dock Area this site does not present itself as the most appropriate location for Sports Grounds & Facilities and Education as proposed as some existing infrastructure will need to be retained.

ESB must maintain the financial performance and strength to deliver our purpose which requires a strong Investment Grade Credit Rating A- or equivalent and BBB+ on a stand-alone basis. It is essential that ESB maximise all assets, including property assets to achieve these standards. As an example, under the PR5 Revenue Determination (2021-2025) ESB is committed to a €4.4 billion capex programme during this period.



Fig. 1.0 – Evolution of land use zoning on ESB lands at Marina.

ESB lands to the north of Centre Park Road continue to be an electricity transmission/distribution network hub for Cork City and its environs and significant lands will be allocated to the delivery of critical distribution transformers to accommodate the proposed new load that will emerge with the development of Cork South Docklands. It is intended that future proposals for the site will be based on integrating development with the wider receiving environment in the area is so far as possible. As outlined below, through proposed amendment 1.197, further expansion of the network will be required adjacent to the recently constructed 110kV GIS substation.

ESB recognise that South Docks will deliver significant residential development over the coming years and it is important to ensure that this development is accompanied by an adequate level of services and amenities, including educational facilities. We suggest that a full school needs assessment is required in the context of more detailed planning of the housing mix that will be delivered for the overall area. In this regard, we maintain that the opportunity to deliver a new urban quarter in the South Docklands should be underpinned by a dedicated framework masterplan for the area. To ensure development comes forward in an integrated, planned and timely manner, it is critical that infrastructural requirements, costs and overall phasing are considered. Given the complexities and timelines involved in regenerating former industrial lands a strategic masterplan that considers the longer term and ensures a plan led approach to the development of the South Docks is required.

In the absence of the lapsed South Docks Local Area Plan (2008), a framework masterplan is urgently required to enable the delivery of an integrated, high-quality development where infrastructure delivery is delivered in step with housing and employment growth. Development of a framework masterplan would offer an opportunity to carry-out essential needs analysis in areas such as education and establish whether the reorganisation and consolidation of Education lands into a single area is the correct approach.

**Until such time as a more detailed masterplan is developed for the Docklands, ESB request that its lands South of Centre Park Road are zoned 02 New Res Neighbourhoods to ensure the phasing of ESB's remediation of its lands can support the critical housing that is required in Cork City.**

### Energy Related Proposed Material Alterations

As recognised throughout the Proposed Material Alterations report and particularly by Proposed Amendment No's. 1.107 & 1.109, 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. 1.197. – Chapter 9: Environmental Infrastructure*

The importance of supplying the City and the Docklands with electricity is acknowledged in the Draft Plan. Prior to closure, the former Marina Generating Station was of vital strategic importance in the provision of flexible generation and transmission system support within the confines of a major urban centre. The Transmission and Distribution infrastructure on site remain of critical importance to the region. It is intended that future proposals for the site will be on the basis of integrating development with the wider receiving environment in the area is so far as possible. In this regard, we welcome the proposal to amend paragraph 9.19 to include additional reference to support for future requirements for major energy service providers by stating:

*“Installation of further distribution transformers at the new indoor 110kV Marina Power Station.”*

*Proposed Amendment No. 1.110. – Chapter 5: Climate Change and Environment*

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 City’s renewable energy resources. In this regard, we welcome the insertion of the text below to update section 5.28, that includes the following statement:

*“...The Plan promotes the generation and supply of low carbon and renewable energy alternatives, having regard to the opportunities offered by the City’s urban morphology, settlement hierarchy and the hinterland...”*

The emergence of opportunities to exploit offshore energy potential have developed significantly in recent years and will continue to do so as technology advances in this sector. We welcome the insertion of additional text through proposed amendment 1.110 that potential exists for the production of electricity from large scale offshore wind energy facilities off the coast of Cork City in the Celtic Sea. The creation of this new industry presents a major opportunity for economic growth in the Cork harbour Area. We welcome that Cork City Council will co-operate with state and semi-state agencies in relation to the implementation of projects in the Celtic Sea. Offshore renewable energy in Ireland will significantly reduce greenhouse gas emissions and accelerate the move to cleaner energy in line with national and EU policy.

*Proposed Amendment No. 1.332. – Car Parking Standards – Table 11.13*

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.

Therefore, to ensure that the Cork City 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 below are consistent with the above Regulation and should be considered to further amend Chapter 11: *Development Management Standards*, Section 11.8.6 *EV Charging Points* in the final 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

## Conclusion

In line with Government policy, ESB is taking urgent and focused action to achieve net zero emissions by 2040 and putting in place the infrastructure and services to enable our customers and broader society to live more sustainably. We are balancing this with the imperative to maintain reliable and affordable electricity supplies to support customers, communities and our economy.


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. Significant ongoing investment is required by ESB, in building smart networks, renewable energy and modernising the generation portfolio. Funding is required to support this major infrastructural investment programme which is essential to meeting binding EU Climate Change targets and to allow all regions to take advantage of economic opportunities. ESB has never required Government subvention and therefore must be able to secure funding and to maximise existing assets, including property assets, to deliver such challenging programmes.

We request that due consideration is given to the issues raised in this submission, most particularly:

- Until such time as a more detailed masterplan is developed for the Docklands, ESB request that its lands South of Centre Park Road are zoned 02 New Res Neighbourhoods to ensure the phasing of ESB's remediation of its lands can support the critical housing that is required in Cork City.
- The final Plan should maintain the planning policies which protect the County's future capacity for the development of energy infrastructure. The reinforcement of support for marine energy solutions, associated landside infrastructure and the installation of further Transmission and Distribution plant and ancillary equipment adjacent to the 110kV Substation at Marina Power Station site are welcomed.
- ESB support the further amendment of Section 11.8.6, *EV 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,



Gerard Crowley | Planning and Asset Manager | Group Property and Security, 42 Merrion Sq., Dublin 2.  
| T: +353 1 702 7163 / +353 87 237 4107 | [www.esb.ie](http://www.esb.ie)