

Our Ref: COS/MF 17-050
Reply To: Kilkenny
Date: 10th October 2019

RSES Material Amendment Submissions
The Southern Regional Assembly
Assembly House
O'Connell Street
Waterford X91 F8PC

**Re: Proposed Material Amendments to the Draft RSES for the Southern Region
Submission by ART Generation Limited.**

Thank you for affording the opportunity to respond to the proposed Material Amendments to the Draft Regional Spatial & Economic Strategy 2019 – 2031 (RSES) for the Southern Region.

We make this submission on behalf of ART Generation Limited who is an active developer in the renewable energy sector in the region and who has developed wind farms in Counties Cork, Kerry, Limerick, Waterford and Kilkenny.

With projected increases in population and economic growth, the demand for energy is set to increase in the coming years. Taking the expansion of manufacturing and Data Centres into account, the Irish Wind Energy Association estimates an annual increased demand of 2%. In this context, the recognition by the Southern Regional Assembly (SRA) of the urgency of climate action and of putting this at the core of the Strategic Vision for the RSES is very important.

Ireland is under increasing pressure to meet its obligations under the 2015 Paris Agreement, EU targets and the 2030 Sustainable Development Goals. The Government's new Climate Action Plan recognises that Ireland has significant renewable resources and aims to make best possible use of these resources by increasing its role in the production of electricity. At present approximately 30% of Ireland's electricity comes from renewable resources and the Plan has set a target to increase this share to 70% by 2030.

In order to achieve these targets and to facilitate this growth in renewable energy, the Climate Action Plan identifies the potential for up to 8.2GW more on-shore wind by 2030. On-shore wind is to be the main source for increased renewable energy followed by offshore wind (3.5GW) and solar PV (1.5GW).

ART Generation is greatly encouraged that the SRA commits itself to formulating a strategy for the Region for the transition to a Low Carbon Economy and Society across all sectors.

We note that this leads on to;

- Strengthening RPO 54, Low Carbon Economy, to emphasise the urgency of the task
- Introduction of a new Objective, RPO F, to develop a Regional Decarbonisation Plan in order to provide a framework for action across all sectors
- Strengthening RPO91, Sustainable Renewable Energy Generation, by overt links to the targets of the National Renewable Energy Action Plan (NREAP) and the Offshore Renewable Energy Plan.

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Currently, the potential for offshore renewable energy is constrained by sub-station capacity along the coasts and only 22MW has been delivered from the Arklow Bank as compared to 4000MW from onshore wind.

Until the infrastructure to accept offshore renewable energy is put in place, it is important that adequate land is designated as suitable for wind energy generation in Development Plans to allow each County to meet its share of the nation's commitment to generate 70% of our energy requirements from renewable sources by 2030.

- Amending RPO 100, Energy Storage Carbon Capture, by committing *“to work with key stakeholders in developing sustainable forestry to support carbon sequestration”*

(We note that Project Ireland 2040 highlights that forests play an important role in helping with climate change mitigation. Forestry is a major carbon sink and in combination with the generation of renewable wind energy can make a significant contribution towards national renewable energy targets.)

- Strengthening RPO 213, Renewable Energy Generation & Transmission Network, to support renewable energy projects linked to high demand facilities such as data centres as well as community renewable energy projects and micro-renewable generation

(We note this is very much in line with Government thinking as set out in 'Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy'¹. Furthermore, under the Draft Renewable Energy Support Scheme (RESS) published by Department of Communications, Climate Action & Environment (DCCA), there is a strong emphasis on community participation whereby a pre-qualification criterion for a project's participation in the RESS will be that the community has been offered an opportunity to invest in that project.)

I trust these comments are helpful to the SRA at this time and ART Generation looks forward to further engagement with the Regional Assembly.

Yours sincerely,



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On behalf of
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¹ Available online: <https://dbei.gov.ie/en/Publications/Government-Statement-Data-Centres-Enterprise-Strategy.html>