

NPF Submissions
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Submission on the Ireland 2040 Our Plan – Draft National Planning Framework (NPF)

Thank you for the opportunity once again to comment on this consultation document led by the Department of Housing, Planning and Local Government. Lightsource welcomes the proactive introduction of this high level national policy document which will be the successor to the National Spatial Strategy 2002 (NSS).

Lightsource Renewable Energy (Lightsource) is Europe's leading utility scale solar energy generator. We launched Ireland's first solar farm in March 2016 at Crookedstone Road, Nutts Corner, Co. Antrim, which directly powers Belfast International Airport. Since then we have built a further 6 sites across Northern Ireland and currently have 3 further sites under construction, including a 25MW (100 acre) solar farm in Maghaberry, Co. Antrim.

We currently have approval for a 19.1MW (82 acre) solar farm at Monaraha, Cahir, Co. Tipperary (Planning Register Reference: 16600565), and have a number of other projects under development in the Republic of Ireland.

The subject report for consideration entitled Ireland 2040 – Our Plan: Draft National Planning Framework (September 2017) covers a thorough and wide-ranging list of emerging areas of consideration. Our response, as in the pre-draft consultation in February 2017, will focus on key matters relating to energy in Ireland, particularly solar energy and how it can add significant value to Ireland's energy mix. The basis of our response will be focusing on *Section 4.6 Planning and Investment to Support Job Creation* and *Section 8.2 Resource Efficiency and Transition to a Low Carbon Economy*, with some general information on solar.

Solar Energy in Ireland

Ireland has legally binding EU targets to meet 16% of its overall energy needs from renewable energy sources by 2020. As part of this target, the Government has committed to increasing electricity generation from renewable energy sources to 40%. Lightsource believes this national policy document is key to achieving these ambitious targets.

If Ireland does not meet these targets, the Sustainable Energy Authority Ireland (SEAI) believe that annual fines of between €100-€150 million per percentage point missed must be paid by Irish taxpayers. By adding solar to Ireland's already varied energy mix, we can reduce the likelihood of missing these targets and reduce our reliance on importing expensive fossil fuels.

Although solar is relatively new to the island, the technology has been around for many years and has proved to be a huge success across the globe. Several countries now generate a significant portion of their energy through solar generation.

Ireland 2040 Our Plan – Draft National Planning Framework

Lightsource welcomes the Draft NPF's broad support for renewable energy. This underlines the nation's strategic move towards a low-carbon energy future. Lightsource's response aims to add value to the document by providing additional information or clarification to matters relating to solar energy, which from our experience will prove beneficial to the deployment of solar in the Republic of Ireland.

Section 1.1 A Vision for Ireland in 2040

Lightsource welcome the *Vision for Ireland* section within the Draft NPF, particularly the recognition within the section entitled *Self Reliance* which states:

"The benefit of making the transition to a low-carbon economy is that a reliable, sustainable and affordable low carbon energy system would make us a global "go-to" location for enterprises and activities that require energy but without environmental impact".

Lightsource would support the following Vision Statement (Page 27) in relation to the type of Ireland we want by 2040:

"Sustainable self-reliance based on a strong circular economy and significant progress towards a low carbon, climate-resilient society while remaining an open, competitive and trading economy".

Lightsource welcomes the paragraph within the introduction section of the Draft NPF entitled *Overview and Key Messages*, as below:

"The future planning and development of our communities at local level will be refocused to tackle Ireland's higher than average (45%) carbon-intensity per capita and enabling a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential and electrification of much of our mobility and energy systems".

National Policy Objectives

The following National Policy Objectives within the Draft NPF are to be welcomed:

(1) Section 4.6 Planning and Investment to Support Job Creation

The Rural Economy (Page 69) – Lightsource welcomes and supports National Policy Objective 21, as below:

National Policy Objective 20

Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the sustainable diversification of the rural economy into new sectors and in particular those with a low or zero carbon output.

Energy Production (Page 71) – Lightsource welcomes and supports National Policy Objective 21, as below:

National Policy Objective 21

Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.

Lightsource further supports the statement within the section on Energy Production (Page 71) of the Draft NPF text which states:

'In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment'.

(2) Section 8.2 – Resource Efficiency and Transition to a Low Carbon Economy

Climate Action and Planning (Page 111): Lightsource welcomes and supports National Policy Objective 56, as below:

National Policy Objective 56

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives as well as targets for greenhouse gas emissions reductions.

Energy Policy and Planning (Page 113) – Lightsource welcomes and supports National Policy Objective 57, as below:

National Policy Objective 57

Promote renewable energy generation at appropriate locations within the built and natural environment to meet objectives towards a low carbon economy by 2050.

Lightsource supports the paragraph within the Draft NPF (Page 113) which states, *'In the energy sector, the transition to a low carbon economy from renewable sources of energy is an integral part of Ireland's climate change strategy and renewable energies are a means for reducing our reliance on fossil fuels'.*

Summary

Lightsource would fully endorse the statements and sentiment within the Draft NPF, which assert *that a transition to a low carbon energy future requires a shift from predominantly fossil fuels to predominantly renewable energy sources*. The Draft NPF provides the opportunity to enshrine this shift in national policy.

Lightsource are, however, of the view that the Draft NPF does not go far enough in promoting solar energy as a proven and viable technology. Whilst Lightsource welcome the confirmation that solar can play a significant part in delivering on the objective of the latter NPF, we note that solar is however referred to as part of the wider contribution from renewables. Lightsource are of the opinion that there should be a separate section dedicated to solar energy (both utility ground-mounted and rooftop), similar to Section 6.5 on Offshore Renewable Energy. This section could include the benefits from solar such as:

- Solar panels generate clean energy in cloudy or overcast weather conditions and actually perform more efficiently in cooler temperatures such as those found in Ireland generally.
- As well as generating clean electricity, solar farms can work in harmony with agricultural activities.
- Compared with many other electricity generation technologies, solar PV is relatively quick to deploy, with low environmental impacts.
- About 70% of a solar farm is open grassland. Therefore, where appropriate, the land can remain in agricultural use for smaller livestock such as chickens or sheep. The infrastructure is raised so that these animals can graze and take shelter beneath the panels and so stocking densities are hardly affected.
- Solar farms can provide havens for local wildlife habitats to flourish undisturbed and allow biodiversity levels to increase, meaning our declining native species can repopulate and find food throughout the seasons.
- Renting land to solar developers for the generation of renewable energy can provide rural business with a predictable, steady income stream which can support the rest of the farming business and keep Ireland's food production industry going.
- The recent clarity provided by the Minister for Finance, Public Expenditure and Reform in the October 2017 budget. In relation to taxation and solar farms, the Minister stated:

"I propose to provide for the leasing of agricultural land for solar panels to be classified as qualifying agricultural activity for the purposes of specific Capital Acquisitions Tax and Capital Gains Tax reliefs. This initiative, which is subject to the panels covering no more than 50 per cent of the total farm holding, should support diversification, expand the generation of renewable energy and help tackle climate change".

http://www.budget.gov.ie/Budgets/2018/Documents/Budget_2018_Financial_Statement.pdf

Lightsource welcomes the move away from *Strategic Energy Zones* that had been referred to within the pre-draft consultation document. We had been concerned that such a designation would not be consistent with the suitable site selection criteria we employ. In addition, policy designation restrictions may have been contrary to the policies of Local Authority Development Plans with the Renewable Energy Strategy. We view the omission of the Strategic Energy Zones as a sensible step.

We are disappointed that the Draft NPF did not provide strategic guidance from central Government to advise and encourage LPA's to update their Development Contribution Schemes to facilitate the deployment of solar for all the reasons we outlined in the pre-draft submission. We would urge the Department to reconsider this and to provide the necessary guidance to prevent non-equitable development contributions.

Lightsource welcomes the fact that the Tipperary Energy Agency (2014) has been referenced as part of the Draft NPF consultation process. The latter agency provides excellent examples of the transition to a low carbon energy approach. Lightsource would urge the Department to further consider the guidance given within the *Planning and Development Guidance Recommendations for Utility Scale Solar Photovoltaic Schemes in Ireland (Sustainable Energy Authority of Ireland)*. This would be particularly relevant if a separate section on solar development were to be introduced as recommended by Lightsource.

Thank you once again for the opportunity to comment on the Draft National Planning Framework. We trust you will find our response of interest and benefit to the final document. Please do not hesitate to contact us if you would like to discuss this response further.

Yours sincerely,



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