



**ELGIN
ENERGY**

Submission by Elgin Energy to
the Consultation on Galway
County Development Plan
2022-2028

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Introduction

This submission is made by Elgin Energy in response to the consultation on Galway's County Development Plan 2022 – 2028.

Elgin Energy is an international solar developer with operations in Ireland, UK and Australia. To date, we have delivered 21 projects / 230MW including the largest solar farms in Scotland (Errol, 13MW) and Northern Ireland (Bann Road, 46MW). Elgin Energy has secured planning permission for twenty-three solar farms across Ireland, including one at Glenamaddy in County Galway. We are continuing to develop solar across the county with the aim of delivering clean renewable energy to local homes. With the right policy objectives in place, these projects can provide a significant contribution to Galway's renewable energy targets.

We commend Galway County Council for calling on public submissions as part of the consultation on the new Development Plan. All development plans must be considered in line with national targets and guidelines. As set out in the Climate Action Plan 2019 and as highlighted as a "Key Challenge" in the Issues Paper, the Government is targeting net zero greenhouse gas emissions by 2050. In order to accelerate this transition, it has set an interim target of 70% renewable electricity generation by 2030 coupled with retiring coal and peat-fired plants by 2025. Under the National Planning Framework and in its support for the roll-out of renewables and the protection and enhancement of carbon pools, the Government stresses the necessity to ensure "that climate change continues to be taken into account as a matter of course in planning-related decision-making processes." In order to achieve 2030 targets a unified national approach supporting the installation of renewable projects is imperative.

Elgin Energy believes the most cost and time-effective and non-intrusive way to achieve climate targets is through the deployment of solar PV. The technology's potential has been recognised and supported by the government through the first auction of the Renewable Electricity Support Scheme (RESS). 796.3MW / 63 solar projects were successful in the auction alongside 479.24MW of onshore wind. These projects are scheduled to be connected to the national grid over the next 18 months.

The solar resource in Ireland varies slightly from Cork to Donegal which should not limit the potential development throughout the island of Ireland and specifically County Galway. Elgin Energy has successfully deployed solar in Northern Ireland and one of the most northerly situated projects in the world, in Perth, Scotland. Ireland also has a very similar solar resource to that of the UK. With 13,000MW of solar installed, UK solar is making significant contributions towards energy targets and the expedition of coal plant retirements. In April 2020, solar PV delivered over 11% of UK electricity demand across one week. Solar was also a major contributing factor to the UK's longest coal-free period since pre-industrial times during the first half of 2020¹. The UK solar industry is experiencing significant growth with a current solar pipeline exceeding 10,000MW. Ireland can achieve similar growth and delivery with the correct policies and support in place.

¹ <https://www.solar-trade.org.uk/record-solar-outputs-help-uk-to-reach-longest-coal-free-period-since-pre-industrial-times/>

This submission focuses on the following areas: Environment, Renewable Energies and Communications, Economic, Enterprise, Tourism and Retail Development, Infrastructure and Transport. We have provided information below relevant to our expertise and experience.

Environment, Renewable Energies and Communications

Q. What are the main environmental issues that currently face Galway?

The main environmental issue facing County Galway is the same as that facing the nation as a whole - the need to take urgent, drastic climate action.

The Issues Paper highlights that 65% of farms in Galway are involved in beef production. This is not compatible with the recent report by the Intergovernmental Panel on Climate Change (IPCC) stating that global beef consumption must reduce dramatically to avert a climate crisis. Diversifying into solar farms could allow a significant number of Galway farms involved in beef production to transition to sheep grazing and alternative forms of farming while still protecting their livelihoods.



Sheep on site at a solar farm

By nurturing the development of solar projects, Galway County Council can generate additional investment opportunities by attracting businesses that want their operations to be powered by renewable energy, such as data centres.

Producing indigenous renewable energy reduces Ireland's dependence on imported energy and increases security of supply. The Sustainable Energy Authority of Ireland (SEAI) estimates that the total cost of energy imports in 2018 was €5 billion. Ireland's import dependency reduced to 67% down from an average of 89% between 2001 and 2015. Despite this progress Ireland remains one of the most import-dependent countries in the EU.²

Solar PV is the fastest deployable renewable energy in the world is therefore best placed to assist Galway County Council with the decarbonisation of its electricity network. Solar PV is low impact and can be located close to demand centres and make use of existing electrical infrastructure. At the end of the project's life the project is decommissioned, and the infrastructure is removed and recycled. The land can then be restored to its original use.

² SEAI Energy Security in Ireland 2020 Report <https://www.seai.ie/publications/Energy-Security-in-Ireland-2020-.pdf>

The solar industry is set to continue its rate of progress as the cost of solar panels continues to decline and the technology becomes cost-competitive with conventional generation such as coal and oil. With support from Government and local Councils, Ireland can begin to capitalise on the opportunity provided by solar PV and introduce competitive clean energy to our national grid.

Q. What additional measures should be taken to protect the environment?

Elgin Energy support the replacement of the Wind Energy Strategy with the technology neutral Local Authority Renewable Energy Strategy (LARES). A diverse energy mix is required to achieve a carbon free electricity network. Given the prevalence of wind energy to date, we would like to see solar PV in all its forms being supported by Galway County Council. Energy storage technologies should also be pursued to support the further development of renewable projects and ensure grid stability.

At a more granular level, Galway County Council should ensure that proposals for solar energy projects consider the following criteria:

- The suitability/strength of the grid and accessibility to it.
- The landscape character of the County.
- Ecological impact.
- Zone of visual influence and visual impact of the structures.
- Glint and glare report and potential impact on adjoining road networks and dwellings.
- Road access and traffic impact
- Archaeological impact.
- Flood Risk Assessment.
- Incorporation of security measures – use of CCTV/surveillance cameras and security fencing.
- Decommissioning.

We believe that proposals that adequately address these criteria should be supported as they should mitigate any potential negative impacts on the surrounding environments.

Q. Where should ~~wind turbines~~ renewable energy projects be encouraged / discouraged?

The site selection process for a renewable energy project must consider and balance a significant number of factors, as outlined above. We support the identification of suitable locations for development within the LARES however these should not be overly prescriptive and development in areas outside of these identified locations should still be considered, provided the site selection process can be justified.

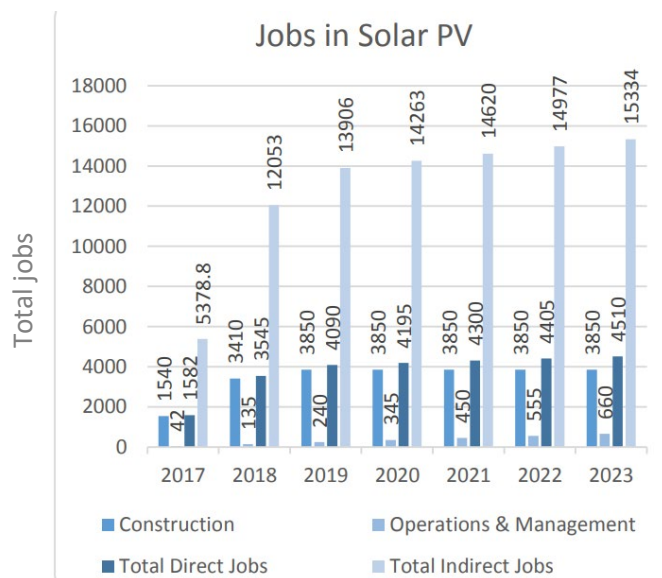
Notwithstanding this, we believe suitable locations for renewable energy projects should, where possible:

- Be in close proximity to existing points of connection to the national grid (i.e. substations or overhead lines)
- Avoid areas designated for environmental protection (e.g. Special Areas of Conservation)
- Avoid sensitive landscape areas

Economic, Enterprise, Tourism and Retail Development

Q. How can the County Plan support inward investment and job creation in the County and where should it be directed?

The Irish Solar Energy Association carried out analysis³ on the employment potential of the Irish solar industry. The forecasted period selected was 2017 – 2023 based on the 2015 White Paper and indications that Government support for solar would soon be introduced. Based on an installation figure of 140MW for the first year, more than 8,000 jobs are created, both direct and indirectly. Employment in the sector is calculated using market factor analysis for direct employment and multiplier analysis for indirect employment. Galway has the potential to support several hundred megawatts of solar across the County, creating significant levels of employment in an entirely new sector.



Elgin Energy is committed to the local communities in which we operate and have provided a community benefit fund on each project we have delivered to date. At a national level, community benefit funds are now mandated for projects awarded contracts through RESS as instigated by the Department of Communications, Climate Action and Environment (DCCA). A contribution of €2 per megawatt hour (MWh) will be made to communities located close to renewable projects for the first 15 years of the project lifetime. By way of example, a 50MW solar project that secured support under RESS-1 would provide a community contribution of approximately €100,000 annually.

³ ISEA Factsheet Jobs in Solar PV <http://irishsolarenergy.org/wp-content/uploads/2019/11/JOBS-in-Solar-PV-Fact-Sheet-16-09-15.pdf>

Infrastructure and Transport

Q. How can the County Development Plan make sure that there is better co-ordination between land use and transportation facilities in order to achieve more sustainable development?

As electrification of transport takes place in Ireland along with the increased adoption of EVs, electricity demand increases. If national climate change targets are to be achieved, increased level of renewables are required to meet this new demand.

To encourage the transition to electric vehicles (EV) in Ireland, increased charging infrastructure is required on a national scale. If renewable energy powers this infrastructure, it will further reduce fossil fuel consumption in the transport sector. Pollution will also be reduced resulting in better air quality.

Elgin Energy encourages policy which supports and facilitates the implementation of charging infrastructure for EVs both on the roads of county Galway and in new developments. We also support policy that supports growth of the EV market such as EV priority parking in town centres.

Development Contribution Scheme

Elgin Energy is committed to working with all County Councils throughout Ireland and have worked very closely with the appropriate planning authorities in the UK to provide local contributions. We wish to do the same in Galway and throughout Ireland however in its current form, the development contribution scheme is set at a comparatively high rate. This has a direct impact on the project's commercial viability.

Due to the established nature of the Irish wind industry, many development contributions were set based on that technology. This baseline does not transfer to solar projects. A 1MW solar project will typically produce 0.9MWh per annum, powering almost 300 homes. In comparison, a 1MW wind farm will produce approximately 2.7MWh per annum powering almost 650 homes. Equally sized wind and solar projects produce different levels of electricity and therefore earn different revenue. We would respectfully request that the Development Contribution Scheme is amended to reflect this disparity and that the contribution for solar is reduced accordingly.

Conclusion

As outlined above, Elgin Energy believes that solar PV can form an essential part of the County Development Plan 2022-2028 and that solar farms can provide several benefits to local communities and the wider Galway county. Solar can assist Galway County Council in boosting local economies, attracting new business, providing beneficial community funding, producing clean renewable energy, and making a significant contribution towards local and national climate change targets.

Elgin Energy is happy to provide our insight and experience to assist Galway County Council in further developing the County Development Plan 2022 – 2028 particularly for Climate Action & Energy objectives. We look forward to continued engagement with Galway County Council on this matter.

If you would like further information on any details in this document or solar PV in general, please contact robert.kelly@elgin-energy.com. To learn more about Elgin Energy and the work we do, please visit our website www.elgin-energy.com.