SUBMISSION BY ELGIN ENERGY TO THE NATIONAL PLANNING FRAMEWORK 2040

IRELAND'S OUTLOOK AND THE POWER OF SOLAR ENERGY

As Ireland, Europe and the world enter a period of profound change, economic diversification and preparedness is crucial. Against this backdrop, and informed by past experiences, the Government must develop a National Planning Framework (NPF) that shields the Irish economy from external changes to the greatest extent possible, and provides future economic opportunity to Irish communities, workers and businesses across the country in innovative ways.

We commend the Minister and Department of Planning for their forward thinking in this regard, and for their progressiveness in calling for public submissions.

As our population grows, how will we plan and build effectively for the future? What infrastructure will be required to sustain this growth? How do we ensure this growth is sustainable and truly regional?

The solution requires joined-up thinking across policymaking and industry. This thinking must embrace the fundamentals—and energy provision is one such fundamental. Communities and economies depend on energy both to survive and flourish. Planning for this should be at the core of the NPF.

Renewable energy technologies such as solar photovoltaics (PV) will be an important factor in the development of these communities, and Ireland—especially rural Ireland—is in an ideal position to become a 'solar hub'. We have the prerequisite space and energy infrastructure to generate significant amounts of it; and the ease of installation of solar panels, their affordability, and their lack of harmful emissions make them perfectly suited to building sustainable communities calibrated for a future moving away from fossil fuels.

Investment and development of the solar energy industry will spur on social and economic growth, and facilitate Ireland's growing population in a clean and responsible way. As such, the provision of renewable energy and energy security should be a key priority for the NPF, and Elgin Energy welcomes this opportunity to contribute to it.

Furthermore, Ireland currently imports over 90 percent of its energy, making us the second most dependent country in Europe on foreign fossil fuels. This must change. By 2025, solar PV energy will become the cheapest form of electricity in the country.

This affordability will help Ireland become a low carbon economy, attract inward investment (particularly from high-tech companies) to all parts of the country, including if not mainly to rurality, and help us become energy independent.

For the first time in the history of the state, Ireland has the opportunity to become self-sufficient, using renewables like solar to meet its energy needs, and creating jobs and generating revenue in the process.

A BRIGHTER FUTURE FOR IRELAND: ELGIN ENERGY'S 6-POINT PLAN

The NPF will deliver fundamental changes to Ireland's infrastructure and economy over the next 25 years and beyond.

Elgin Energy is keen to assist the Government in this significant undertaking. Below, we have set out an introductory 6-point plan that would allow the solar industry and the Government to create jobs, generate revenue, and help establish a low-carbon, environmentally friendly economy that provides for both urban and rural populations:

1. Develop national planning guidelines for solar PV energy

In the UK, in the majority of cases, domestic and commercial rooftop solar panel installation is exempt from formal planning permission - exempt development. For ground mount installations, the planning process is quick, straightforward and transparent primarily due to the minimal impacts ground mount solar installations have on the environment and landscape.

Ireland does not have an equivalent process, and for the solar PV industry to develop here, one must put guidelines in place. A framework similar to the UK's, with few barriers to entry, should be jointly developed by industry and Government. This will allow rapid propagation of solar power, of particular use to rural Ireland.

2. Position Ireland as a solar hub

Ireland is an international business hub. We attract some of the world's most advanced and innovative companies, many of which require state-of-the-art, energy-hungry facilities like data centres and manufacturing plants.

Environmentally conscious multinationals like Apple and Google—massive stakeholders in Ireland's economy—have ambitious clean energy targets. By investing in solar energy and creating a legal framework for its development, Ireland would acquire a reputation for a clean, renewable energy market liberated from expensive fossil fuel price fluctuations. This would attract increased and continued foreign investment. From an employment and revenue perspective, a KPMG report estimates that Ireland's solar industry could support as many as 7,300 jobs, and that activity in the sector could contribute as much as €800 million a year in tax.

3. Create new opportunities for rural Ireland

Ireland's solar energy potential is more or less equal across the country—a solar farm in Cork will generate essentially the same amount of energy as a solar farm in Donegal. This is good news for rural Ireland.

With industry and state investment, Ireland's attractiveness as a solar hub, and the windfalls associated with this, like job creation and revenue generation, would spread out to the countryside. Farmers who install solar panels on their land have the ability to plan for long-term growth due to certainty of income and price stability, allowing future generations to live sustainably in rural areas.

4. Provide more clean energy at a low cost

Solar energy is a renewable, zero-emissions energy source, and is therefore environmentally friendly. Solar panels are easily set up and deployed. They can be mounted on buildings or installed in open spaces, like fields, with minimal construction cost and effort, and with little visual impact on the landscape.

The cost of these panels has dropped dramatically in recent decades. The UK, which has a climate similar to ours, has installed a total 12GW (gigawatts) of solar energy projects, creating thousands of jobs. The broader European solar PV market will likely grow from 80GW to between 250-400GW by 2030. [See Appendix – Figure 1.] Ireland's energy needs are predicted to increase in the years ahead, and solar will help alleviate a significant portion of this burden.

5. Invest in solar to move towards energy independence

Ireland depends on imported energy to meet its electricity, heat and transport needs. [See Appendix – Figure 3.] Investing in solar energy allows us to move towards energy independence, decreasing our reliance on foreign fossil fuels and sparing us the cost and anxiety of the oil, coal and gas markets.

The fuel price of solar energy is a known entity from day one. As the technology has in excess of a 40-year lifespan, consumers can expect a large portion of their electricity costs to be covered within the first decade, and experience zero costs thereafter.

6. Invest in solar to meet EU targets

In 2007, the EU agreed new climate and energy targets for 2020 resulting in the adoption of the Renewable Energy Directive 2009/28/EC (the Directive). The Directive sets a binding target of 20 percent of final energy consumption from

renewable sources by 2020. Under the Directive, Ireland has a national target for renewable energy consumption of 16 percent in 2020.

Solar PV installations will play an important role in enabling Ireland to meet its 2020 and future renewable energy targets, saving the country from large EU fines. Ireland to date has not been ambitious enough in setting its targets to transition to a low-carbon economy. [See Appendix – Figure 2.]

CONCLUSION

Elgin Energy believes that the above 6-point plan will help the Government achieve its goals of boosting economic activity in both urban and rural populations, providing jobs and low-cost energy, while simultaneously working towards Irish energy independence and meeting the EU's ambitious clean energy targets.

We are happy to provide our expertise and experience in solar and renewable energy to ensure the NPF achieves its objectives. We look forward to engaging with the Government on this matter in the months and years ahead.

30 MARCH 2017

ABOUT ELGIN ENERGY

Elgin Energy is an Irish solar development company based in Dublin. To date Elgin has developed 250MW (megawatts) of solar PV farms throughout the UK and Northern Ireland, including a 46MW project in Co Antrim in March 2017 providing clean, green energy for over 75,000 households. Using our experience delivering these projects in the UK, Elgin has plans to develop more than 350MW of solar PV across Ireland in the coming years.

Appendix

Figure 1 – SolarPower Europe graph showing expected solar PV contribution to EU's electricity demand by 2030

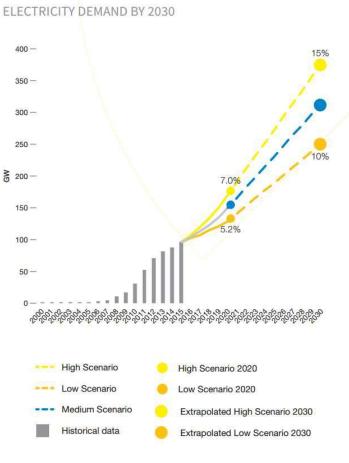


FIGURE 25 POSSIBLE SOLAR PV CONTRIBUTION TO EU-28

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Figure 2 – Eurostat graph showing Ireland's share of renewable energy in its gross final energy consumption

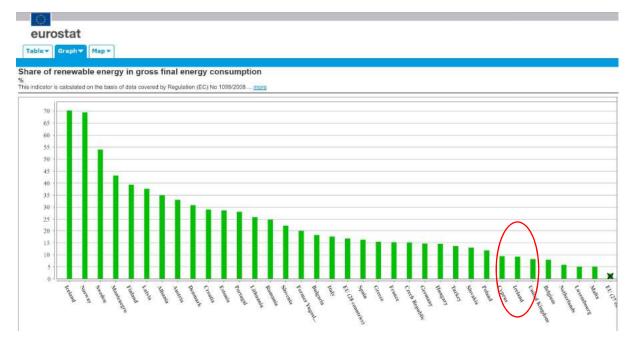
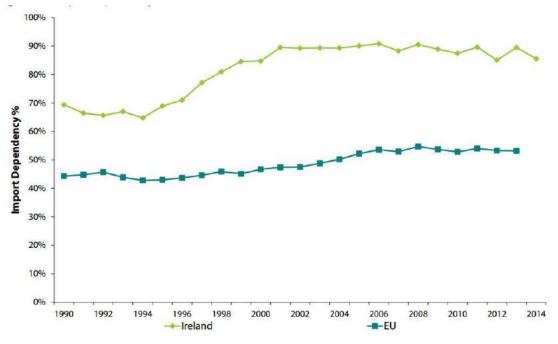


Figure 3 – SEAI graph showing Ireland's dependence on imported energy, compared to the EU average



Source: SEAI

Figure 4 – Elgin Energy solar panel installation – no negative impact on economic activity

