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NPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
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Custom House,
Dublin D01 W6X0

9th November 2017

Re: Public Consultation on the draft of the National Planning Framework 2040

Gaelectric welcomes the opportunity to comment on the draft of the National Planning Framework (NPF) process. The NPF will be central to both Ireland's energy future and the critical decarbonisation of our country.

The decarbonisation of EU economies, and promotion of renewable energy technology, is at the core of the EU's agenda for climate change and energy. In the long-term, the EU policy is to limit the global warming to 2°C. To meet this target, the EU has formulated binding targets for 2020 with supplementary goals for 2030 and 2050. Within the 2020 timeframe, the EU renewable energy directive sets a binding target of 20% final energy consumption from renewable sources. Generally speaking, most EU countries are in line to meet their 2020 targets, however Ireland will not meet its RES target of 16% and EPA and SEAI analysis suggests that the shortfall will be in the range of 2.7% to 3.0%.

Looking beyond 2020, the 2050 Energy Roadmap for Europe is the EU commission's long-term policy with regard to sustainable energy use. The Roadmap suggests that, by 2050, the EU should cut its emissions to 89% below 1990 levels through domestic reduction alone. It sets out a cost-effective pathway to achieving this goal with milestone reductions in the order of 40% by 2030, 60% by 2040 and 80% by 2050. Figure 1 (from the SEAI's publication "Ireland's Energy Targets – Progress, Ambition & Impacts") illustrates the challenges of meeting these goals, when past and present energy-related emissions in Ireland are considered.

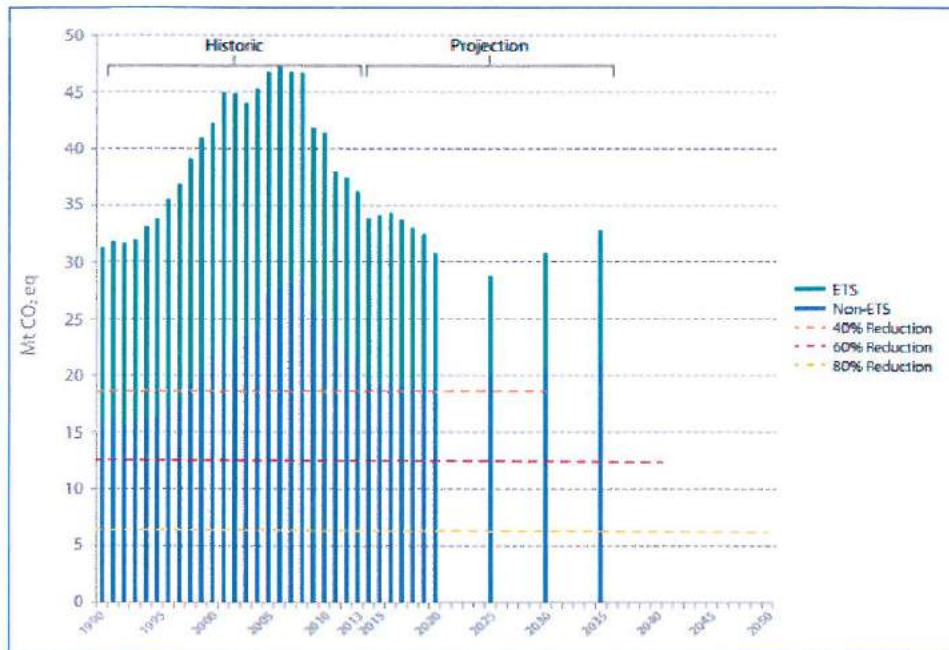


Figure 1 – Energy-related emissions only (ETS & non-ETS)

Since the 2050 Roadmap was published, the Climate Change challenge has increased¹, so the final 2030, 2040 and 2050 targets can be expected to be even more onerous.

Looking at the nearest intermediate goal post-2020, by 2030 the EU is targeting at least 27% of final energy consumption from renewable sources as a whole in addition to a 40% reduction in domestic greenhouse gas emissions and 27% improvement of energy efficiency. The 2030 Framework for Climate and Energy, adopted in 2014, targets a continued growth of in the share of renewable energy in the electricity sector, increasing to at least 45%. The renewables target is binding at EU level and Member States will not receive individual binding targets as was the case with 2020 targets. Member States are asked to present their self-defined renewable energy targets and their plans for the respective implementation measures. However, national measures need to be in line with the State aid guidelines of the European Commission. Furthermore, the European Council stresses that the production of renewable energy, which for wind and solar is inherently intermittent, requires more interconnected energy markets and storage solutions which should be coordinated at the regional level.

However, Environment Members of the European Parliament (MEPs) have now proposed that the share of renewable energy in the European Union's gross final consumption of energy should be at least 35% by 2030.

Table 1 outlines what a 27% or 35% EU wide RES target in 2030 might mean for Ireland and the simplest method is to assume a pro rata allocation across Member States and across Electricity, Heat

¹ The concentration of CO₂, a planet-warming greenhouse gas, set a new record in 2016, according to a report by the U.N. World Meteorological Organization. The year-to-year spike in CO₂, from 400 ppm in 2015 to 403.3 ppm in 2016, also represents the biggest annual jump on record.

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& Transport within each Member State. As a reminder, for 2020, the EU target is 20% RES and Ireland's targets are 16% RES, with a specific target of 40% RES-E. Table 1 shows the probable impact on Irish targets as a result of the EU 2030 target range of 27%-35%. We have assumed a straight line ramp up of targets between 2020 and 2030 to show annual targets for Ireland.

Table 1 – Sensitivity analysis illustrating Ireland's renewable energy targets for 2030 considering possible increase in EU wide target.

| Year | Targets if EU target of 27% by 2030 | | Targets if EU target of 35% by 2030 | |
|------|-------------------------------------|-------|-------------------------------------|-------|
| | All RES | RES-E | All RES | RES-E |
| 2020 | 16.0% | 40.0% | 16.0% | 40.0% |
| 2021 | 16.6% | 41.4% | 17.2% | 43.0% |
| 2022 | 17.1% | 42.8% | 18.4% | 46.0% |
| 2023 | 17.7% | 44.2% | 19.6% | 49.0% |
| 2024 | 18.2% | 45.6% | 20.8% | 52.0% |
| 2025 | 18.8% | 47.0% | 22.0% | 55.0% |
| 2026 | 19.4% | 48.4% | 23.2% | 58.0% |
| 2027 | 19.9% | 49.8% | 24.4% | 61.0% |
| 2028 | 20.5% | 51.2% | 25.6% | 64.0% |
| 2029 | 21.0% | 52.6% | 26.8% | 67.0% |
| 2030 | 21.6% | 54.0% | 28.0% | 70.0% |

Inherent in the above analysis is the very ambitious assumption that Heat and Transport targets can also be met and don't have to be compensated for by even larger RES-E targets.

The baseline scenario in the RESS consultation suggests a continuation of the 40% RES-E target for 2030. This is therefore completely inappropriate as it does not take cognisance of the developing EU policy as outlined above. The analysis presented in Table 1 indicates that a 54% RES-E target should be considered the absolute minimum acceptable target for 2030.

Given the target of at least 80% decarbonisation of the power sector by 2050 and the length of time it takes to develop projects, virtually all critical projects and infrastructure needed to deliver the 2050 target will enter the planning process within the timeframe of the NPF. Therefore, it is essential that this decarbonisation target is central to the NPF and the plan facilitates the attainment of the targets.

As an indication of what this could mean in terms of ADDITIONAL renewable energy projects, and considering electricity only, getting from 40% RES-E to 70% by 2030 would require:

- 2,500MWe of wind onshore wind and 900MWe offshore wind
- 125MWe of biomass
- 2,000MWe of solar

Many existing wind and hydro projects will also have to undergo repowering or upgrading which currently also requires new planning permission.

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"Self-Reliance" and "Improving sustainability in terms of energy" are cornerstone concepts within the NPF and correctly states that reducing our dependency on imported energy is a must. This can only be realised if there is a clear planning policy framework which supports the required growth in the country's renewable energy requirements. The criticality of future planning policy is further reinforced by the recent proposed decision paper by the Commission for Regulation of Utilities ("CRU") on the Enduring Connection Policy which proposes that all renewable energy projects will require planning permission approval prior to lodging a grid application. Furthermore, the recent public consultation on the design of the Renewable Energy Support Scheme (RESS) suggests bi-annual auctions, with pre-qualification conditions including planning permission and a grid connection agreement. Therefore, any delays in the planning process will therefore considerably impact project delivery timeline as auction entry may be missed.

Gaelectric believe that 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"*] should specifically endorse the development of renewable generation and supporting businesses as a stimulant for rural areas.

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."*] should explicitly include reference to renewable energy generation as this can be an additional income for the rural economy. The agri-food and drink sector accounts for 7.6% of Ireland's economy-wide GVA, (DAFM, 2014), 10.7% of Ireland's exports and 8.4% of total employment. (DAFM, 2015). In 2016, Irish agri-food and drink exports increased by an estimated 2% to approximately €11.15bn (Bord Bia, 2017). The UK was the main destination for Irish agri-food and drink exports in 2016 accounting for 37% of all exports. 32% of exports went to Continental EU markets while the remaining 31% went to international markets.

Sustainable, farm-based energy, including growing biomass and other energy crops, has the potential to contribute significantly to Ireland's energy demand and in so doing, offset the sources of greenhouse gases that are harder to reduce such as from beef and dairy production. It can also complement food production, providing additional income for farmers and so helping the rural economy become more resilient. The Irish Bioenergy Association ("IrBEA") estimates that 3,600 new permanent jobs to be created in agri-energy by meeting 2020 RESS targets, involving:

- €1.5 billion of direct investment into the Irish economy
- €430m per year spent on operating new energy facilities
- Reduce Ireland's energy import bill by 7.5%
- Sustaining family farm incomes through new biomass supply chains.

We agree with National Policy Objective 44 [*"Support, within the context of the Offshore Renewable Energy Development Plan (OREDPA) and its successors, the progressive development of Ireland's*

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offshore renewable energy potential, including domestic and international grid connectivity enhancements”] that Offshore Renewable Energy will support our transition to a zero carbon economy, however this will only happen if the OREDP is supported by sound and unhindered planning policy to allow development to occur. Offshore Wind projects require the highest pre-construction investment by developers of any renewable energy technology and therefore will only be investable if the route through permitting is clear and defined. The integration of the NPF with the new Maritime Area and Foreshore Act needs to be ensured by the Department. The ongoing delays to the implementation of the Maritime Area and Foreshore Act is impeding the development of the nascent offshore wind sector and needs to be rectified as soon as possible (i.e. this year). As offshore projects will be large in scale (>50MW), consideration should be given to deeming them as Strategic Infrastructure and therefore covered by the Strategic Infrastructure Regulations.

National Policy Objective 49 [*“Strengthen all-island energy infrastructure and interconnection capacity to enhance security of electricity supply”*] will become critical considering both the uncertainty regarding the impact of Brexit on current energy supply and the necessity to fast-track interconnection with Europe to allow Ireland realise the ambition as a net exporter of energy. For Ireland’s natural energy resources to be fully captured with maximum economic, environmental and social gain for the Nation, the level of Interconnection between Ireland and both Great Britain and Continental Europe needs to increase significantly. Again, such developments should be deemed as Strategic Infrastructure and therefore covered by the Strategic Infrastructure Regulations.

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.”*] will be central to encouraging renewable energy development, the initiative to integrate climate action requirements into the planning system should be enacted quickly.

Gaelectric welcomes 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”*] and would suggest that detailed policy outlining the “appropriate locations” be fast tracked to ensure that renewable generation is developed in a strategic and cohesive manner.

We believe the statement *“Promotion of renewable energy is supported by policy in the form of a public service obligation [PSO] levy”* is misleading as the PSO levy also supports peat fired generation. The PSO levy is currently perceived solely as a support for renewable generation, however 24% of PSO support is for climate damaging fossil fuelled generation at a higher €/MWh cost than supported renewable generation. It is vital that we reduce and eventually remove peat fired power stations from our generation mix as the intention is to diversify away from fossil fuels.

Furthermore, not all renewable energy is supported through the PSO. It only applies to electricity and does not cover heat and transportation which combined account for nearly 80% of energy usage in Ireland. Recognition is needed that renewable energy is not just about wind turbines. It is also

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about such developments as biomass district heating schemes, biogas plants with injection into the gas network and rooftop solar. Some specific measures to include would be:

- Complete exemption from the planning process for rooftop solar of up to 1MW.
- Incorporation of rooftop solar should be a pre-requisite for planning consent for all commercial and industrial buildings in business/industrial parks as in France

We note that the statement *"Deliver 40% of our electricity needs from renewable sources by 2020 with a strategic aim of in excess of 50% by 2030 and more by 2040 and beyond using wind, wave, solar, biomass and hydro sources"*, however as outlined at the start of this letter, these ambitions will not be in keeping with our international commitments and certainly not as ambitious as the Citizens Assembly's wishes. Gaelectric requests that the Department ensures that the NPF recognises the need to decarbonise power generation, heating and transportation substantially by 2050 and enables the development of renewable energy projects to support our targets and reduce the risk of future fines from the European Union.

Recent research published by the European Commission entitled "Special Eurobarometer 459 Climate change" highlights that there is resounding support within the Irish population to fight climate change. 88% of the population believe that more public financial support should be given to the transition to clean energies and 96% believe it is important that the government sets targets to increase the amount of renewable energy used by 2030. This is a clear indicator that the departments ambitions are not in line with the publics.

Public sentiment towards climate change is further reinforced by the recent Citizens Assembly recommendations, including 98% of members recommending that a new or existing independent climate change body should be resourced appropriately, 100% of members recommended that the State should take a leadership role in addressing climate and 97% of members recommended that the State should end all subsidies for peat extraction

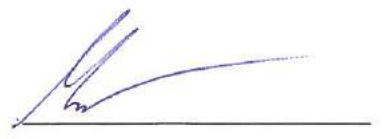
The NPF, together with the RESS and correctly implemented Enduring Connection Policy, has the potential to make Ireland's ambition to be decarbonised by 2050 a reality and clear indications to developers surround land use and planning policy should be delivered.

Gaelectric wish to thank Department of Housing, Planning, Community and Local Government for the opportunity to engage positively and constructively on NPF and highlight the significant impact that this framework will have on the renewable energy industry's future in Ireland.

Kind regards



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