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Stádas: Submitted
Submission: Solar Farms and Climate Action

Údar: Lightsourcebp

Comhairliúchán:
Draft Carlow County Development Plan 2022-2028

Litir Chumhdaigh

Lightsource bp welcomes the publication of the Draft Carlow County Development Plan 2022-2028 and we would like to thank the Council for the opportunity to make this submission.

Lightsource bp is a global leader in solar energy generation. We are primarily focused on utility scale ground mounted photovoltaic installations, which we develop and operate, selling the electricity generated either for use on the national grid network, or directly to a specific high energy user. Lightsource bp is committed to promoting the use of solar energy in Ireland and beyond as an economically viable and environmentally sound alternative to fossil fuels or nuclear generation. With a global pipeline of 16GW, we have developed approximately 3GW of solar projects globally to date. This includes 10 solar farms in N. Ireland, one of which powers Belfast International Airport, providing almost a third of the airport's energy needs.

We would like to make the following observations relating to Chapter 7: Climate Action and Energy and Chapter 4: Enterprise and Employment, within the Draft County Development Plan:

Observations:

Chapter 7: Climate Action and Energy

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The new Carlow County Development Plan presents an opportunity to promote the county as a place that prides itself on its climate action and renewable energy credentials. Closely linked with this is the perception of the local authority area as an excellent place to potentially do business and create employment.

Chapter 7 of the Draft County Development Plan 2022-2028 marks a departure to a more progressive approach to solar farm applications, than within the current adopted plan. The Draft Plan has innovative and forward-looking policies that will provide an incentive for the solar industry to become established in the county, and therefore help facilitate and attract inward investment. The primary objective for deploying renewable energy in Ireland is to advance economic development, improve energy security, access to energy, and mitigate against climate change. These key areas are all covered within the Draft Development Plan, but further synergy is needed between them in policy terms.

Lightsource bp welcomes the overall tone and approach the Council have adopted towards renewable energy within Chapter 7 of the Draft Development Plan. The Council's commitment to reduced CO2 emissions, is both laudable and timely within the current climate emergency. Lightsource bp is encouraged by the strategic 'Aim' of

Chapter 7, and how climate mitigation is to be embedded into council policies and objectives:

'Aim: To combat climate change and its impacts in the County by promoting and supporting policies and objectives which contribute towards a transition to a low-carbon and climate resilient future, and which focus on reducing greenhouse gas emissions and energy demands through appropriate and effective climate mitigation and adaptation measures'.

The above 'Aim' within Chapter 7 is welcome, particularly as it focuses on moving the county 'towards a transition to a low-carbon and climate resilient future.' However, this aim should be worded more decisively with dates and targets in line with wider national policies within the Climate Action Plan 2019. Only through the setting of defined and focused targets on carbon and other GHG emissions, can such an 'Aim' be measured and benchmarked for success. Lightsource bp contend that the stated 'Aim' should relate and refer to the current national policy on renewable electricity generation, namely the Climate Action Plan 2019. This would typically mean amending the 'Aim' to reflect the national target to generate 70% of electricity demand within the County, to be sourced from renewables by 2030. Lightsource bp is of the view that solar generation can contribute significantly, in a timely manner to such agreed targets. We are of the view that the target should be amended to state:

'Aim: To combat climate change and its impacts in the County by promoting and supporting policies and objectives which contribute towards a transition to a low-carbon and climate resilient future, and which focus on reducing greenhouse gas emissions and energy demands in line with targets within the Climate Action Plan, through appropriate and effective climate mitigation and adaptation measures'

Section 7.5.4 of Chapter 7 refers to the above Climate Action Plan (2019). However, the entire Chapter fails to mention even once, the central pillar within the Climate Action Plan of 70% renewable electricity generation by 2030. This is rather disappointing and indeed glaringly absent from this important Chapter within the Draft Development Plan. In addition, none of the policies within Chapter 7 promote or refer to this central target of the Climate Action Plan. Entitling the section '*Climate Action and Energy*' seems rather odd when one of the central pillars of the Climate Action Plan is not referred to or translated into policy.

Lightsource bp welcome the removal of the current **Energy Policy 9** from the Draft Plan. The latter 10MW cap on solar farm applications was unsustainable, creating a regional inequality in the drive towards achieving national targets on renewable energy. Lightsource bp is of the view that each solar farm project should be considered and assessed on a site-by-site basis. The proposed Draft Plan provides policy to support the long-established principles of proper planning and sustainable development in combination with site-specific environmental considerations. If adopted, the Draft County Development Plan will enable Carlow to share equitably the national responsibility for renewable energy commitments needed over the coming years. As an eastern county within a region where electricity demand is much higher than other parts of Ireland, where the grid network is substantially better served and with land perfectly suited to solar development, Carlow is best placed to accommodate utility scale solar developments and meet renewable energy commitments.

Lightsource bp welcome the following policies and objectives within the Draft County Plan;

- *CA. P2: Support the transition of the County to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.*
- *RE. P1: Encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.*

- *RE. 01: Seek to achieve a minimum of 130MW of renewable electricity in the County by 2030, by enabling renewable energy developments, and through micro-generation including rooftop solar, wind, hydro-electric and bioenergy combined heat and power (CHP).*
- *IF. P1: Support the development, reinforcement, renewal, and expansion of key supporting infrastructure to facilitate renewable energy developments, subject to compliance with proper planning and environmental considerations.*
- *SE. P2: Favourably consider the development of solar farms on agricultural lands which allow for farm diversification and multipurpose land use.*
- *SE. 01: Increase the penetration of solar energy developments at appropriate locations subject to compliance with proper planning and environmental considerations.*

Lightsource bp would however urge caution in the adoption of Policy SE. P1: which reads as follows:

'Favourably consider the redevelopment of brown field sites for large solar PV projects subject to proper planning and environmental considerations'.

Preference or undue weight afforded to the use of brownfield land fails to take cognisance of the current land requirements for modern utility scale solar farms. Achieving competitiveness and reaching the targets set for renewable electricity generation as per the Climate Action Plan 2019 (70% by 2030) will require larger sites and economies of scale. Brownfield supply in Ireland is largely in central urban areas or in edge of town locations. The scale of brownfield required for a solar farm is unlikely to be found within an Irish brownfield context.

A solar farm project will be unlikely to compete commercially on urban brownfield land against the financial strength of a residential developer. The use of the word 'brownfield' in Policy BE. P1 is therefore too generic and open to interpretation by third parties and objectors. If the Council's definition of 'brownfield' really means rural brownfield such as cut away bog and landfill, then this should be stated. Lightsource bp would however highlight that such rural brownfield sites are not always suitable due to issues pertaining to biodiversity, ground stability and gas release.

In addition, Lightsource bp is of the view that Section 7.10.3.2 could be developed to consider the most pressing challenges to solar development and planning considerations across the county. This section should outline that solar farms are relatively quick to deploy, in comparison with other energy generation technologies, and we believe well sited solar farms can help meet urgent renewable energy targets, without impacting negatively on local communities or the environment. In particular, the Draft County Development Plan should consider the innovative approach known as co-location, where solar, battery storage and wind farms symbiotically co-exist. This is a highly sustainable use of existing infrastructure, with the solar farm and a nearby wind farm sharing infrastructure. We would suggest that a policy objective should be included as below:

'Favourable consideration will be given to the re-use, shared use (co-location), refurbishment, repair and repowering of existing renewable energy technology developments in order to prolong the life span of developments such as wind farms and solar farms providing that these do not result in unacceptable impacts on the environment or residential / visual amenity.'

Lightsource bp is also of the view that the County Development Plan should provide clarity to prohibit the unnecessary use of restrictive conditions that prevent an increase in MW export capacity without submitting a new planning application. Such conditions prevent repowering within the original planning approval, are unreasonable and run contrary to the ability of generators to repower simply because a suggested MW figure may have been

quoted on drawings or within the text of a supporting statements. Such restrictive conditions on MW capacity are contrary to a condition lead flexible approach to repowering. The final export capacity of a solar farm is not a land use issue and should not be controlled or capped within a condition of planning consent. Naturally, if MW export capacity is linked to development contributions, the additional contributions should be sought by the Local Authority.

Finally, Lightsource bp would suggest that policy provision within the new Development Plan should extend to providing support for flexible and enforceable conditions in any planning consent for a solar farm, to allow minor non-material changes to the panel and infrastructure layout. This level of detail can be agreed prior to commencement of development. The rationale behind this is that many utility scale solar farms have been afforded a 10-year permission by the Local Authority, and technology can evolve in relation to panel types and infrastructure in the years leading up to the commencement of development. A flexible and open condition requesting the submission and agreement of the final design, elevations, colour and location of panels and electrical infrastructure prior to the commencement of development could address this issue. The nature of the proposed amendments and the materiality of the changes is of course central to this approach.

The policies within the new Carlow County Development Plan therefore should be clear, targeted, and focused, demonstrating how renewable forms of energy are to be encouraged and in what areas of the local economy they can particularly assist. The use of renewable energy like solar, can stimulate jobs and reduce reliance on fossil fuels. As stated above, Quality Indicators used to locate many foreign direct investment companies include access to reliable energy that has come from low carbon sources.

Utility scale solar developments provide the best opportunity to achieve both local 'green' targets set within the County Development Plan and help assist with national targets on electricity generation. In addition, they facilitate reductions in carbon emissions and contribute positively to the local environment through biodiversity enhancement.

Chapter 4: Enterprise and Employment

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The draft County Development Plan has considered business, employment, and enterprise creation within Chapter 4. Lightsource bp are of the view that economic development must be sustainable and achieved within the context of carbon reductions. This is lacking within the tone and wording of Chapter 4. The Enterprise and Employment Strategy refers to the following policy:

- *ES. P1: Work in partnership with Enterprise Ireland, IDA Ireland, adjoining local authorities, the Regional Assembly and all other relevant agencies to proactively pursue sustainable enterprise and economic development in line with the vision of Carlow County Council together with policies and objectives set out in national, regional and local strategies.*

Through the new Development Plan, Carlow has an opportunity to take ambitious steps to attract inward investment, both indigenous and foreign direct investment (FDI). It is the view of Lightsource bp that utility scale solar is a key incentive in this process. Increasingly FDI companies wish to locate near to a secure supply of renewable electricity. This can be seen in Ireland with Facebook in Meath, Eli Lilly in Kinsale, Amazon in Cork, and Microsoft in Dublin. Peter Freed, Data Centre Renewable Energy Manager in Facebook encapsulates this 'green goal' very well in the statement below:

"Our goal is simple: power our data centres with clean and renewable energy and, where possible, help green the grid by adding new renewable resources."

The infrastructure facilities that are normally promoted in any town referred to within a County Development Plan are likely that the town boasts a number of fully serviced sites, it has excellent transport links, and the availability of high-speed broadband in the area. What very often is not considered is the potential end user's requirements for clean, secure, and renewable energy. Quality Indicators used to steer the location for FDI investment include access to reliable energy that has come from low carbon sources.

Amongst the type of FDI companies that may consider Carlow as a location are likely to be Pharmaceutical providers, Data Centres and other FDIs with internal corporate policies that require substantial (if not 100%) of their energy to be sourced from renewable sources, to reduce their and carbon footprint. In N. Ireland, Lightsource bp has developed solar farms which serve a local manufacturer called Brett Martin (produces plastic sheet manufacturing) and Belfast International Airport. These are excellent examples of solar energy supporting local enterprise, creating and protecting jobs, and meeting renewable energy targets. The Council should be aspiring to become a supporting platform for local business development and companies that embrace renewables. Policies that are both positive towards renewable technology such as utility scale solar, and actively forge the link between employment, investment and renewable energy are required in Chapter 4.

The policies within the new Carlow County Development Plan therefore should be clear, targeted, and focused, demonstrating how renewable forms of energy are to be encouraged and in what areas of the local economy they can particularly assist. The use of renewable energy like solar, can stimulate jobs and reduce reliance on fossil fuels. As stated above, Quality Indicators used to locate many foreign direct investment companies include access to reliable energy that has come from low carbon sources.

Utility scale solar developments provide the best opportunity to achieve both local 'green' targets set within the County Development Plan and help assist with national targets on electricity generation. In addition, they facilitate reductions in carbon emissions and contribute positively to the local environment through biodiversity enhancement.

Documents Attached: Níl

Teorainneacha Gafa ar an léarscáil: Níl