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**From:**  
**Sent:** 03 November 2020 14:04  
**To:** Local Development Plan  
**Subject:** Derry City & Strabane District Local Development Plan - Draft Strategy  
**Attachments:** Lightsource bp - response to DCSD Draft LDP 03.11.20 (ID 1782167).pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi – please find attached the response to the consultation on the Derry City & Strabane District Local Development Plan - Draft Strategy, on behalf of Lightsource bp.  
Please feel free to contact me if you have any questions.

Principal Environmental Planner | nr



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Lightsource bp has continued its global leading charge in the development and management of solar energy projects, while continuing to work remotely where we can throughout this period. Please continue to send any communications via email. For any notices which must be in original/written format, please send by post with a copy by email.



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Cromac Street  
Belfast  
BT2 8LA

3<sup>rd</sup> November 2019

Dear Sir/Madam,

**Re: Comments by Lightsource bp on the Derry City and Strabane District Council Local Development Plan 2032 - Draft Plan Strategy.**

## **1.0 Introductory Background**

Lightsource bp welcomes the opportunity to contribute to the emerging Derry City and Strabane District Council Draft Plan Strategy. Lightsource bp are a leading global solar energy generator, with over 2GW of energy projects, operating across 13 different countries including Britain, Ireland, US, Brazil, Australia and India. We are primarily focused on utility scale ground and roof mounted photovoltaic installations, which we maintain and operate, selling the electricity generated either for use on the national grid network, or directly to a specific high energy user. Lightsource bp are committed to promoting the use of solar energy in Northern Ireland and beyond as an economically viable and environmentally sound alternative to fossil fuels or nuclear generation.

## **2.0 Derry City and Strabane District Council Local Development Plan - Draft Plan Strategy**

We would like to thank the Council for this opportunity to make a submission to the Derry City and Strabane District Council Local Development Plan 2032 - Draft Plan Strategy.

Lightsource bp would refer the Planning Authority to the commitments that the UK Government have set in legislation for a requirement to a 'net zero' economy by 2050. In Northern Ireland we have already reached 45% of our electricity consumption from renewables, however without a published energy strategy, Northern Ireland is yet to set a target. Recent comments by the Economy Minister would suggest that this target should not be below 70% by 2030.

Lightsource bp acknowledges that Derry and Strabane District Council lead the way currently in terms of the level of renewable energy generation across Northern Ireland. There is however an opportunity within Council's final adopted Local Development Plan to promote the council area as a place that prides itself on its renewable energy credentials. Closely linked with this is the perception of the authority as an excellent place for enterprise and employment development.

The Local Development Plan presents an opportunity for the Council to focus the future Local Development Plan's vision for the development of the local authority area over the coming years. The vision for the Plan should therefore be forward thinking and foster sustainable economic and

employment growth, promoting the talents of its diverse communities, whilst protecting its unique cultural & natural heritage in a manner that responds to the challenges which climate change presents.

### 3.0 Solar Energy Development

Lightsource bp welcomes the Council's commitment to tackling the climate emergency, in particular the Council's aim to permit a diverse range of renewable energy developments in the District to align with the Strategic Growth Plan and the Council's Climate Change Adaption Plan. Lightsource bp is supportive of the policy direction and guidance provided within the wider Strategic Planning Policy Statement (SPPS), and the value that is placed on the protection of our most precious natural assets, within a context of tackling climate change through enhanced proportion of renewable energy sources. However, we are concerned that the policies within the subject Draft Local Development Plan within Chapter 24 may be at odds with the SPPS, therefore fail the soundness test and make the deployment of renewable projects more difficult.

Lightsource bp are concerned that draft policy within Chapter 24 RED 1 'Renewable and Low Carbon Energy Development' may prove overly restrictive in relation to solar farms, particularly the following draft policy wording;

iv. *'there shall not be unacceptable loss of Best and Most Versatile agricultural land (BMV).'*

In Northern Ireland, there is no formal and agreed definition of what is *best and most versatile agricultural land*. In other justifications within the UK, such classification is provided within the Agricultural Land Classification (ALC). This does not cover Northern Ireland and indeed the policy within RED 1 iv does not indicate what is defined by the term. The term best and most versatile is too subjective. When selecting a site for a solar farm, a number of key criteria are involved including landscape designation, planning policy, heritage considerations, floods analysis and grid connectivity. Adding an additional and subjective further layer will add to the complication of this process and limit the development of potential sites. Solar farm developments do not take farmland out of agriculture, as the grazing of sheep and poultry can quite easily co-exist with the solar project. Intensive sheep or poultry farming can continue after the solar farm has been constructed and indeed Lightsource bp have many examples of this throughout our sites in Great Britain.

v. *'....a time limit condition of 30 years will normally be attached'*.

It is the view of Lightsource bp that the above attempt to restrict the lifetime of a solar farm project within the draft policy has the potential to limit development and green investment in solar renewables. This is due to the fact that the warranty on many solar panels and infrastructure equipment is currently 40 years as seen in Britain, and the business case to attract finance to develop a solar farm is currently based on more than 30 years (normally reflecting the warranty of the infrastructure). Any such wording within a condition should reflect the business case for the project and be on a case by case basis. In addition, it should reflect a date from energisation of the project (as opposed to the commencement of development). Lightsource bp welcome that a defined time limit condition has not been included in the draft policy in relation to anaerobic digesters and hydro-electric schemes. We would therefore question why it is required and we support a similar approach to solar developments. This is a farm diversification project and as such it should not be time limited.

Solar farms are relatively quick to deploy, in comparison with other energy generation technologies, and we believe well sited solar farms can help meet renewable energy targets, without impacting negatively on local communities or the environment. In particular, the draft Local Development Plan should consider the innovative approach known as *co-location*, where both solar 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 the infrastructure (that may already be in place with the wind project).

Combining renewable resources and increasing the productivity of the existing infrastructure is a logical progression for the solar industry. With reduced development costs and construction timeframes, coupled with shared use of existing infrastructure and operating costs, renewable co-location could act as a catalyst for the future development of solar projects in an environment without a support scheme route to market.

#### **4.0 Enterprise and Investment**

The Local Development Plan should consider how to promote the Derry City and Strabane District Council area to attracting inward investment in employment and enterprise. It is our view that renewable energy and solar in particular, is a key incentive in this process. Increasingly foreign direct investment (FDI) companies wish to locate near to a secure supply of clean renewable electricity and very often have their own renewable targets to meet. This can be seen in the Republic of Ireland with Facebook in Meath, Amazon in Cork and Microsoft in Dublin.

The Local Development Plan therefore should contain clear, targeted and focused policies and objectives, which demonstrate 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 and in particular solar, can stimulate jobs and reduce reliance on fossil fuels. Northern Ireland has a number of functioning utility scale solar farms which serve either large manufacturers or industries that have a high energy demand (i.e. Belfast International Airport). These are excellent examples of solar energy supporting local businesses, 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.

As well as local companies, many large FDI multinationals in deciding where to locate operations, are increasingly emphasising a desire for secure, clean renewable energy. An example of this is the recent Facebook data centre in Clonee, which sources 100% of its energy from renewable sources. Peter Freed, Data Centre Renewable Energy Manager in Facebook encapsulates this:

*“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.”*

#### **5.0 Climate Change**

The development of renewable energy generation sources should be a priority of policy makers, not just for the economic reasons outlined above, but equally due to the challenges that climate change will present. Tackling climate change has increasingly become a key national government priority for the planning system in Ireland. The Development Plan should focus minds on ways to promote and attract high quality economic development that minimises the impact on climate change. This can be achieved through promoting policies for implementing renewable energy technologies such as solar PV.

## **6.0 Conclusions**

Lightsource bp would be willing to meet with Planning Officers from the Council to discuss these suggestions for the Local Development Plan at any stage. Please contact [redacted] on any of the numbers below.

Kind regards,

[redacted] – Principal Environmental Planner,  
Lightsource bn