

LDP-PS-REP-115
(SS LDP-PS-REP-41)

From: [REDACTED]
Sent: 06 November 2020 11:36
To: Local Development Plan
Cc: [REDACTED]
Subject: Local Development Plan (LDP 2032): Draft Plan Strategy – Submission of revised consultation response
Attachments: RES Response to Derry City and Strabane Draft Plan Strategy 06112020.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Dear Development Plan Team

Thank you for your email. RES previously submitted a response to the Draft Plan Strategy Consultation, dated 27th January 2020. I would like to advise you that we have made a slight revision to response. Therefore please use the attached letter dated 6th November 2020 as RES's response.

Kind regards

[REDACTED]
Senior Development Project Manager - Lead



Committed to a future where everyone has access to affordable zero carbon energy

Renewable Energy Systems Limited, registered in England and Wales with Company Number 1589961
Registered Office: Beaufort Court, Egg Farm Lane, Kings Langley, Hertfordshire WD4 8LR

From: [REDACTED]
Sent: 2 November, 2020 12:44 PM
Subject: Local Development Plan (LDP 2032): Draft Plan Strategy – Reminder of closing date for Re-Consultation period.

Dear Sir / Madam

I write to remind you that the current period of re-consultation on the draft Plan Strategy (dPS) of the Local Development Plan 2032 (LDP) **will close shortly on Friday 6th November 2020**. Representations received after this date may not be accepted.

Before the end of Friday 6th November 2020, it is important that you tell the Council how you wish your previously made consultation to be considered during this statutory re-consultation period.

211-999-29-901

If you wish to have your previously submitted representation carried forward as it is, please email us at LDP@derrystrabane.com or write to us at **Planning LDP Team, 98 Strand Road, Derry BT48 7NN**. Alternatively, if you wish to revise or provide additional information in support of your previous representation, or to withdraw it, or wish to submit a new representation, you can also email / write to us, or preferably use the online Representation Form:

https://www.derrystrabane.com/getmedia/18adf031-a2dc-491b-98a5-80c77673a416/Final-LDP-Reps-2-Re-Consultation-form-2020_1.pdf

Apologies for further correspondence again on this matter, but it is important that the Council is instructed on how you wish your previously made consultation to be considered before the 6th November 2020 deadline.

Best wishes,



Head of Planning

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LOP-PS-REP-115
(S/S LOP-PS-REP-41)



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6th November 2020

Dear Sir/Madam

Response to the Derry City and Strabane District Council Draft Plan Strategy

Thank you for the opportunity to respond to the Draft Plan Strategy. Please find to follow RES's response. RES originally responded to the Draft Plan Strategy consultation on 27th January 2020. The response has been revised to include reference to the recent Ministerial Statement regarding a renewable electricity target for Northern Ireland.

Yours faithfully,



Senior Development Project Manager - Lead



211-938-29-901

(111-938-29-901 211)

This representation is submitted on behalf of RES UK & Ireland Limited ('RES') in response to the consultation on the Derry City and Strabane District Council draft Plan Strategy (dPS).

RES welcomes the opportunity to engage with Derry City and Strabane District Council (Council) on its draft Plan Strategy (dPS) for the Local Development Plan (LDP) 2032, and we look forward to engaging with the Council as the Plan progresses.

About RES

RES is one of the world's leading independent renewable energy project developers with operations across Europe, the Americas and Asia-Pacific. At the forefront of renewable energy development for over 30 years, RES has developed and/or built almost 12,000 MW of renewable energy capacity worldwide. In the UK alone, RES currently has more than 1,000 MW of projects either constructed, under construction or consented. RES is active in a range of renewable energy technologies including onshore and offshore wind, solar, as well as enabling technologies such as energy storage.

RES has developed 16 onshore wind farms in Northern Ireland totalling 229 MW, which equates to 36% of Northern Ireland's onshore wind capacity. RES currently operates over 83 MW of wind capacity across Northern Ireland, has secured planning permission for a further 112 MW awaiting construction and has 92 MW in the planning system.

RES is involved in a range of renewable energy technologies, including onshore wind, solar, offshore wind, wave and tidal, as well as enabling technologies such as energy storage and demand side management. Across all of these, their reputation for quality and reliability is second to none.

RES aims to be at the leading edge of the transition to a low-carbon economy across the UK and Ireland by generating renewable energy and supporting the technology that creates it. They also provide development, engineering, construction, and asset operation and maintenance services for utility-scale onshore and offshore wind, solar, and energy storage installations.

RES is fully supportive of sustainable development and committed to exploring opportunities for wind energy development to deliver positive impacts to the local community and economy whilst addressing environmental considerations.

Renewables Contribution in the District Council Area

Currently there is 373MW of renewable electricity capacity in the Derry City & Strabane District Council area with another 211MW either in the planning system or in development. These pipeline projects have the potential to make a significant contribution to Northern Ireland decarbonising its electricity supply, as well as to the Council's rates income.

Current Benefits

- Rates from wind farms: £2.79m (2017/18)
- Community benefits from wind farms: £475k per year

- Pipeline Wind
- Consented: 89MW
- In planning: 9MW
- Pre planning: 113MW
- Total: 211MW

Projects in the pipeline have the potential to increase renewable electricity output in Council by almost 57% with a direct financial benefit of circa £1.8m per year to the Council and the community. RES would anticipate that in 2021 the Department for the Economy (DfE) will set an ambitious strategy for energy decarbonisation which will likely stimulate further investment in renewables in the area. We would like to highlight the statement on 29th September 2020 by Economy Minister Diane Dodds relating to the setting of a new renewable energy target for Northern Ireland:

“Northern Ireland has been hugely successful at bringing forward renewable electricity investments. We continue to be a market leader, achieving almost 48% of electricity consumed in the region from indigenous renewable sources – largely onshore wind.

“We have led the way in developing renewable electricity and this success has helped to support a low carbon and renewable energy economy made up of 3,500 businesses, 5,400 jobs and £269million of exports.

*“Whilst work is ongoing to gather the evidence needed to set a new target for Northern Ireland, **I firmly believe that this target should not be below 70% by 2030.***

“This outlines how ambitious I want our Energy Strategy to be; and I want stakeholders and investors to be aware of our ambition.”

As demonstrated in The Wind Dividend report, renewable electricity helps to reduce consumer bills with investment in wind energy saving consumers £135m between 2000-2020. In this period 9m tonnes of carbon have also been saved.

When we consider the further benefits of cleaner air and local job creation, the renewable electricity industry has provided significant benefit to our economy, people and environment.

Net Zero

The UK Government has set in legislation a requirement for a ‘net zero’ economy by 2050. To achieve this the power sector, which has already made significant strides towards decarbonisation, would have to reach net zero by 2040. It is expected that for other sectors such as heat and transport the transition will be longer hence power having to do the early heavy lifting. Without more renewables, net zero cannot be achieved.

In Northern Ireland we have reached 45% of our electricity consumption from renewables and the 2030 target for renewable electricity will not be less than 70%, as referenced above. RES notes that the Republic of Ireland has set a target of 70% by 2030 with Scotland aiming for 100% by 2030.

We have an obligation to play our part in achieving net zero with a duty on all public authorities to facilitate this. RES therefore urges Council to ensure that the requirement to achieve net zero, and to achieve the ambition set out for a renewable electricity target of at least 70% by 2030, form a fundamental pillar of the Plan Strategy (PS) and its vision. The PS should prioritise policies that promote electricity from renewable sources. This will assist in meeting other shared objectives set out in the Regional Development Strategy (RDS), the Sustainable Development Strategy (SDS) and the Strategic Planning Policy Statement (SPPS).

Public Support for Renewables

With all energy infrastructure projects there is likely to be some level of local concern. RES and its members are committed to working with communities to ensure that projects are designed and sited in such a way to maximise the benefits and mitigate any negative impacts. The Council should note that as well as the legitimate concerns some may have, there is widespread support for renewables. The Department for Business, Energy & Industrial Strategy Public Attitudes Tracker shows that 93% of the public in Northern Ireland are in favour of renewables, the highest level of any region in the UK.

Economic Benefits of Renewables

Increasingly foreign direct investment (FDI) companies wish to locate near to a secure supply of clean renewable electricity, many of whom have corporate policies on green energy and decarbonising. For example, two solar farms provide renewable energy privately to large energy users such as Belfast International Airport and Brett Martin. A model for future energy projects, Power Purchase Agreements (PPAs) such as these, should be given additional policy direction and protection. Renewable electricity PPAs can not only lower our regional reliance on fossil fuels but can also help our local indigenous companies to reduce energy costs and be more competitive.

RES suggests that the Council should include in its PS reference to the wider role that the renewable energy sector can play in generating jobs, encouraging investment, protecting against increasing utility bill increases, strengthening the grid, reducing harmful emissions and the over-reliance on imported fossil fuels.

Existing Planning Policy

RES is supportive of the existing planning policy regime and in particular the balance that is struck in the Strategic Planning Policy Statement (SPPS), between the need to protect and conserve our most precious landscapes, and the need to proactively tackle climate change through enhanced proportion of renewable energy sources.

The Regional Development Strategy (RDS), through its Strategic Planning Guidelines seeks to reduce our carbon footprint: one measure promotes the increased use of renewables to reduce Northern Ireland's dependency on fossil fuels. Similarly, the SPPS directs local councils to provide policies and proposals in their LDPs that support a diverse range of renewable energy developments.

The SPPS stipulates that LDPs must take into account the aim and regional strategic objectives of the SPPS in relation to renewable energy, local circumstances, and the wider environmental, social and economic benefits of renewable energy development.

In the context of the Net Zero requirement these policies will need to be updated and will only further emphasise the facilitation of renewable projects in order to meet our climate objectives. Council should be devising its LDP with this at the forefront, lest it become out of date before it is published.

PPS18 and SPPS

RES urges a clear statement of intent that the LDP and any associated policies should unambiguously align with national policies, frameworks and strategies such as PPS18 and the SPPS. Policy RE1 of PPS18 states that:

Development that generates energy from renewable resources will be permitted provided the proposal, and any associated buildings and infrastructure, will not result in an unacceptable adverse impact on:

- (a) public safety, human health, or residential amenity;
- (b) visual amenity and landscape character;
- (c) biodiversity, nature conservation or built heritage interests;
- (d) local natural resources, such as air quality or water quality; and
- (e) public access to the countryside

SPPS Regional Strategic Policy 6.221 outlines that:

Councils should set out policies and proposals in their Local Development Plans (LDPs) that support a diverse range of renewable energy development, including the integration of micro-generation and passive solar design. LDPs must take into account the above-mentioned aim and regional strategic objectives, local circumstances, and the wider environmental, economic and social benefits of renewable energy development.

RES is concerned that in its draft Plan Strategy Council has added a significant number of additional criteria under which renewable applications could be refused and the draft Plan could be outwith the requirements of regional policy.

RES is wholly supportive of a balanced policy which protects the local environment, whilst promoting the appropriate development of renewable energy projects. In this way Council can recognise their wider environmental benefits and properly follow the criteria-based approach advocated in the SPPS whilst also recognising the additional need for this form of development in the context of the new Net Zero target. Visual impact must be considered against the climate emergency and the potential environmental devastation of not meeting our net zero requirements.

Climate Emergency

Paragraph 7.13 notes the Council's decision in June 2019 to declare a 'Climate Emergency'. In the words of Greta Thunberg "I want you to act as if your house is on fire. Because it is."

RES welcomes the Council's commitment to tackling the climate emergency in particular;

Economic Development Objectives, paragraph B (iv): To recognise the North West's significant renewable energy resource and encourage the use of sustainable energy both as a means of generating money for the local economy, attracting investment in enterprise and providing sustainable and affordable electrical power for the population.

- GDP 2 (ii): promoting the use of energy efficient, micro-generating and decentralised renewable energy systems
- 7.111: The Council wishes to facilitate and encourage greater integration of renewable and low carbon energy technologies
- 7.114: As part of the sustainability drive, to tackle 'climate change', increase biodiversity and offset the carbon impact of developments, this policy seeks to encourage most developments to plant compensatory trees
- 21.7: climate change is a global driver for natural heritage and landscape change

However RES is concerned that despite the recognition of the benefits that renewable energy can bring to the district's economy, people and environment, that the dPS could hinder development to such an extent that those benefits are not realised and Council therefore fails in its objective to tackle the climate emergency. In this regard we think the dPS fails to meet soundness test CE1 (coherence and effectiveness).

Renewable and Low Carbon Energy Development

The dPS notes that as of March 2017 "Derry City and Strabane District is the single largest producing council of renewable energy". The Council should be proud of this achievement and RES looks forward to working with the Council to ensure that the district remains at the forefront of renewable electricity generation.

The dPS further recognises the financial benefits that renewables have brought to the district in terms of rates and community benefit schemes which amount to over £3m per year based on RES recent figures. With 211MW of wind in the pipeline and two solar farms already consented, there is potential to significantly increase this figure.

Paragraph 24.7 of the dPS refers to the then UK Government targets for an 80% reduction in carbon emissions by 2050. As noted above, this has now been replaced by a 'net zero' legal requirement by 2050. RES believes that the final Plan Strategy should reflect this legal duty and that council should explore how it can do more to play its part in achieving these ambitions including by recognising renewable developments as regionally and nationally significant.

The dPS should be amended to explicitly include a commitment that the Council will play its part in helping to achieve 'net zero'.

RED 1: Renewable and Low Carbon Energy Development

RES welcomes the assertion in RED1 that the "wider environmental, economic and social benefits of all proposals for renewable energy and low carbon projects are material considerations". As highlighted above, renewable electricity projects have brought significant benefits to the district as well as contributing to wider regional and national policy objectives.

Wind Energy Capacity Areas

Draft policy RED1 fails to outline the meaning of and rationale for the proposed Wind Energy Capacity Areas (WECAs). The Council provides no evidence base as to the necessity for this designation or any criteria by such designations will be decided. At 24.17 the dPS makes reference to a 'saturation point' again with no explanation as to what this means or how it is measured.

It is a reality that not all areas will be suitable for the deployment of renewable technologies and in putting further restrictions in place for renewable deployment the Council risks rendering meaningless any objectives it sets itself in terms of climate mitigation.

RES can see no rationale for the introduction of WECAs and thinks they should be removed from dPS. Renewable developments should be considered on a case by case basis with a requirement to demonstrate the reasons for the choosing of a particular site.

It is considered that the draft Policy conflicts with these objectives and the plan is incoherent as the objectives are not carried through into the implementation of draft policy. The plan therefore fails soundness text CE1.

Special Countryside Area

RES notes the additional designation of Special Countryside Area (SCA) for an area of the Sperrins which is above 310m and what like further information and evidence as to why this seemingly arbitrary height was chosen.

RES welcomes that there are exemptions from the assumption against development for projects of regional or national importance and would argue that in the context of climate emergency that renewable developments should be considered within this category. While we accept that not all sites will be acceptable for renewable developments we believe that each case should be taken on its own merits with the proposer given the opportunity to address any concerns about an application that the Council may have.

It is considered that the draft Policy conflicts with these objectives and the plan is incoherent as the objectives are not carried through in to the implementation of draft policy. The plan therefore fails soundness text CE1.

Areas of High Landscape Importance

RES again notes an additional designation within the dPS and questions the Council's rationale for its inclusion.

It is RES's view that the existing designations of Area of Outstanding Natural Beauty (AONB), Area of Special Scientific Interest (ASSI) and Greenbelt, are sufficient to protect the district's natural assets and that the additional designation of WECAs, SCA and AHLIs are therefore unnecessary.

Draft policy RED1 adds additional restrictions to the deployment of renewables in contradiction of the policies of the SPPS, RDS and the main objectives of the plan. RED1 therefore fails soundness tests CE1, CE2, CE3 and C3.

Repowering

Repowering represents a fantastic opportunity to increase the output from existing wind farms often by replacing older turbines with a smaller number of larger, modern, more efficient turbines. The repowering of a windfarm differs from that of developing a greenfield site as the area has previously been developed, has demonstrated its suitability for use as a windfarm site, and will continue to be used for the same activity.

RES is disappointed that the dPS fails to recognise the benefits of repowering. Acknowledging the benefits other councils have taken a more facilitate approach. For example Policy RE1 of the draft Plan Strategy for Mid and East Antrim states "A proposal for the re-use, refurbishment or repowering of an existing renewable energy development in order to extend its lifespan will be considered favourably".

RES would urge the Council to recognise that repowering can maximise the benefits of a renewable developments, whilst minimising the impact and introduce a presumption in favour of repowering.

Solar

The dPS should make direct reference to the potential that solar PPAs have in providing clean, green energy across the Council area. Solar farms are quick to deploy and well sited solar farms can help meet local and national energy targets, without significantly impacting on local communities or the environment. In particular the PS could consider the innovative approach known as co-location, where both solar and wind turbines symbiotically co-exist. This is a highly sustainable use of existing infrastructure, with the solar and wind installations sharing grid infrastructure.

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, co-location will shape the future development of renewables over the coming years.

Along with wind energy, solar is one of the cheapest forms of new electricity generation. Solar will play a vital role if we are to fully decarbonise our power supply at a low cost to the consumer.

The Plan Strategy should include targeted and focused objectives, which demonstrate the manner in which renewable forms of energy are to be encouraged. Renewable energy technologies such as solar can stimulate jobs and reduce reliance on fossil fuels.

UT 3: Telecommunications & Connectivity, including Broadband

RES welcomes the facilitative approach that the Council has taken towards telecommunications infrastructure. Electricity grid infrastructure is necessary to facilitate the development of renewables and it is important that the Plan Strategy ensures that the policy for renewable energy and telecommunications development are consistent and complimentary.

We have some concern that the statement that telecommunications infrastructure projects "should avoid areas of landscape sensitivity such as AONBs, Special Countryside Areas and Areas of High Landscape Importance" could be interpreted as a presumption against development in these areas. However paragraphs 19.22 – 19.24 would suggest that while there may be further scrutiny of proposals in these areas that there is not a presumption against. RES would appreciate this being clarified in the final Plan Strategy.

Conclusion

RES encourages Derry City and Strabane District Council to take a forward-looking approach to renewables and the low-carbon economy. This will bring clear benefits to the Council area, not alone in combatting climate change, but in fully positioning itself to maximise the economic benefits which renewable energy can bring. With growing recognition of the climate emergency, the drive to net zero and the ambition of a renewable electricity target of at least 70% by 2030, the increased powers now in place at Council level provide an opportunity to achieve success in this area. We look forward to supporting the Council in these endeavours.

