

LOP-PS-REP-130

(SJS LDP-PS-REP-63)

From:
Sent: 06 November 2020 16:37
To: Local Development Plan
Cc:
Subject: RE: Local Development Plan (LDP 2032): Draft Plan Strategy
Attachments: RNI response to DCSDC draft Strategy Plan (Final).pdf
Follow Up Flag: Follow up
Flag Status: Completed

Hi,

Please see attached RenewableNI response to the consultation on the Derry & Strabane draft Plan Strategy.

RenewableNI is the new name for NIRIG, and this response is an update to and replaces the previous NIRIG submission.

If you have any queries please do not hesitate to get in touch.

Regards,

Head of

RenewableNI

M: | **T:** 028 9044 6240
www.RenewableNI.com

From:
Sent: 19 October 2020 15:18
Subject: Local Development Plan (LDP 2032): Draft Plan Strategy – Reminder of closing date for Re-Consultation period.

Dear Sir/Madam

Please see attached in relation to the Derry City and Strabane District Council LDP draft Plan Strategy Re-consultation.

Kind regards

Administration

Derry City & Strabane District Council
Planning Department
98 Strand Road

Derry
BT48 7NN

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Derry City & Strabane
District Council

Comhairle Chathair
Dholre & Cheantar
an tSraitha B'áin

Derry Citie & Strabane
Districk Cooncil

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RenewableNI submission to Derry City and Strabane District Council draft Plan Strategy

5th November 2020

RenewableNI is the new name for NIRIG. We are the trade association and the voice for the renewable electricity industry in Northern Ireland. RenewableNI represents over 40 businesses, fostering knowledge exchange, sharing best practice and supporting policy development.

RenewableNI 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.

Renewables in Council

Currently there is 373MW of renewable electricity capacity in the 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. Renewable electricity projects also contribute to the community in the form of benefit schemes.

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

Pipeline Storage

Pre planning (storage): 50MW

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.

RenewableNI regrets the decision made by the Minister for Infrastructure, Nichola Mallon MLA, to refuse planning permission for the SSE Doraville wind farm.

The 115MW Doraville project was expected to deliver;

- £150m investment
- £50m direct to NI businesses with £15.6m to local firms
- £28.8m in rates payments
- £15m in community funds over 25yrs
- 427 job years, 129 in the local area¹

This is a significant loss to the Derry and Strabane area and highlights the potential of planning policy to drive away investment and resultant job creation in the renewables sector, particularly in the context of the Council declaring a Climate Emergency in June 2019².

RenewableNI 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 note the Economy Minister, Diane Dodds' statement that the target for renewable electricity will not be less than 70%³. This will require at least a doubling of renewable electricity capacity across Northern Ireland as the electrification of heat and transport creates increased demand.

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.

¹ SSE, *Doraville Wind Farm*

² <http://meetings.derrycityandstrabanedistrict.com/mgAi.aspx?ID=22168>

³ <https://www.economy-ni.gov.uk/news/minister-highlights-plan-ambitious-new-renewable-electricity-target>

Net Zero

The UK Government has set in legislation a requirement for a 'net zero' economy by 2050⁴. 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 almost 48%⁵ of our electricity consumption from renewables. RenewableNI notes that the Republic of Ireland has set a target of 70% by 2030 with Scotland aiming for 100% by 2030. With DfE due to publish its energy strategy by the end of next year, Northern Ireland is yet to set a target however the Minister's intentions have been set out.

Along with all other public bodies, Council has an obligation to achieve net zero. RenewableNI therefore urges Council to ensure that the requirement to achieve net zero forms 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. RenewableNI 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 85% of the public in Northern Ireland are in favour of renewables, the highest level of any region in the UK.

⁴ www.legislation.gov.uk/uksi/2019/1056/contents/made

⁵ NISRA, *Electricity Consumption and Renewable Generation in Northern Ireland July 2019 to June 2020*

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.

RenewableNI 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

RenewableNI 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 2035 (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. LDP's should be evidence based, adaptable to change and up-to-date.

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

RenewableNI 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.

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

RenewableNI 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 in the planning balance

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."

RenewableNI 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 RenewableNI 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.

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



RenewableNI looks forward to working with the Council to ensure that the district remains at the forefront of renewable electricity generation.

At 24.1 the dPS states "This District has particularly strong potential for generation of renewable and low carbon energy, especially from wind, hydro, biomass and solar."

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 RenewableNI 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. RenewableNI 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 and regionally and nationally significant.

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

It must also include specific policies detailing how the Plan Strategy can facilitate the realisation of the "potential" outlined in 24.1. In addition RenewableNI believes that at 24.8 the Plan Strategy should refer specifically to "renewable development" rather than "sustainable development" which has a more general interpretation.

The plan fails soundness test C3.

RED 1: Renewable and Low Carbon Energy Development

RenewableNI 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. However RED1 will not guarantee the development of further renewables in the District and along with other sections of the dPS could act as a barrier to such development.

Under "Wind Energy Development" section viii. protects the amenity "of any sensitive receptors (including future occupants of committed developments)". However this contrasts in relation to noise, paragraph 7.77 stating "Greatest weight in decision-making will be placed on consideration of the impacts on 'actual' sensitive receptors; whilst the impacts on 'potential' sensitive receptors ... can be a consideration, it is likely to be given limited weight."

RenewableNI believes that a consistent approach should be taken with limited weight being given to the amenity of 'potential sensitive receptors'.

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 how 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.

We have concerns regarding the overall inconsistencies in applying these restricted areas, the transparency behind their inclusion, and lack of evidence for their designation.

WECAs are an unnecessary additional barrier to renewable projects and the designation is contrary to the SPPS. As the dPS fails to identify the location of WECAs there has been no independent appraisal of their introduction. WECA 1 will guide the spatial location of the renewable energy development and must be appraised along with suitable reasonable alternatives to meet Strategic Environmental Assessment (SEA) Regulation requirements.

Designation WECA 1 therefore fails soundness test P3.

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.

RenewableNI can see no rationale for the introduction of WECAs and thinks they should be removed from dPS.

Council should take a similar approach as it does in ED7 in relation to countryside areas stating as an exceptional circumstance “where it is demonstrated that the proposal due to its size or site specific requirements needs a countryside location”. Similarly, 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.

Special Countryside Area

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

RenewableNI 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 development we believe that applications should be assessed on a case by case basis with the proposer given the opportunity to address any concerns about an application that the Council may have.



No other reasonable alternatives to the proposed policy have been considered as required by Strategic Environmental Assessment regulations. Furthermore, the location of the SCAs have not yet been established therefore Council could not make an informed conclusion when assessing the policy within the Sustainability Appraisal.

RenewableNI therefore contends that policy NE6 fails soundness test P3.

RenewableNI is adamant that the emphasis on protecting and respecting sensitive environments should be balanced against the climate emergency and the role renewables play in protecting the environment.

Areas of High Landscape Importance

RenewableNI again notes an additional designation within the dPS and questions the Council's rationale for its inclusion. We are welcoming of the fact that consideration will be given to regionally or nationally significant proposals and believe that renewable developments should be included in this category for the reasons outlined above.

It is RenewableNI'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. There is no robust evidence to support their inclusion and RenewableNI believes that Council is deviating from the SPPS.

Draft policy RED1 adds additional restrictions to the deployment of renewables in contradiction 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 fewer 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.

RenewableNI 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".

RenewableNI 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 Power Purchase Agreements 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 dPS 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 in fully decarbonising our power supply at a low cost to the consumer.

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

Hybrid sites and co-location

It is evident that the period from 2020 to 2030 will be crucial in minimising and mitigating climate change impacts. It is our view that Local Development Plans across Northern Ireland must establish a positive policy and decision-making framework for new renewable energy developments which support the use of the most efficient technologies including standalone and co-located energy storage, solar and onshore/offshore wind.

Local Plans should therefore emphasise the critical role that energy storage can play in complementing the further deployment of renewable generation. Large scale Energy Storage Schemes (ESS) will be required across the country to realise the full benefit of a flexible low carbon energy system. These facilities can be located in urban or rural areas and should be considered as essential infrastructure to avoid unnecessary delays in deployment.

Using the potential of the renewable energy sector to deliver multiple benefits across the area, can ensure Derry City & Strabane District Council plays its full part in responding to the climate emergency and we would welcome explicit support for ESS within the final Plan.

UT 3: Telecommunications & Connectivity, including Broadband

RenewableNI 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 dPS 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. RenewableNI would appreciate this being clarified in the final Plan Strategy.

Conclusion

RenewableNI 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 and the drive to net zero, 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.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "Sharon".

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