

NIRIG response to Causeway Coast and Glens Preferred Options Paper

24 September 2018

The Northern Ireland Renewables Industry Group (NIRIG) represents the views of the renewable electricity industry in Northern Ireland, providing a conduit for knowledge exchange, policy development, support and consensus on best practice between all stakeholders. Committed to making a positive difference, we promote responsible development, support good community engagement and deliver low-cost electricity generation from sources such as onshore wind, tidal, solar and storage using our greatest natural resources.

NIRIG welcomes the opportunity to engage with Causeway Coast and Glens Council on its Local Development Plan Preferred Options Paper (POP) and we look forward to further opportunities to engage with the Council as the Plan progresses.

Overall, we note with concern the negative approach to renewable energy provision in the POP. This does not seem to be aligned with the regional policy approach promoting all forms of renewable energy and a low carbon economy. For example, the Regional Development Strategy has an overarching emphasis on renewable energy and development of a low carbon economy, as does the DETI paper 'Considering Energy in Northern Ireland to 2050' and the DfI Strategic Planning Policy Statement.

The POP lacks a focus on the prioritisation of the low carbon economy, which is one of the greatest economic opportunities globally. This Council area alone receives approximately £3.5 million annually in rates income from wind farms, along with significant voluntary community benefits contributions to community groups from wind farms.

There is a negative approach to renewable energy provision, which is inconsistent with the regional approach promoting all forms of renewable energy and low carbon economy. The stated position of Council that *"the general thrust of the PPS/SPG appears to be working well- there is no evidence that it requires a substantial change"* is at variance with the restrictive renewable energy policy options contained within the POP.

We note with some alarm the potential Introduction of a Spatial Approach and Sterilisation of land available for renewable energy provision (in particular onshore wind) through the introduction of a series of additional landscape designations including:

- Buffer zones around quarries to exclude inappropriate development
- Buffer around towns and villages where turbines not permitted

- Existing flood plain buffers and also strips in addition to existing
- Tourism Conservation Zones
- Landscape:
 - Creation of Special Countryside Areas
 - New policies specific to each AONB
 - Creation of Areas of Constraint
 - Areas of constraint created in relation to high structures in sensitive landscapes.

LDP Vision, Overarching Principles and Strategic Objectives

We recommend inclusion of reference to the low carbon economy in **section 5.1**.

We recommend amending social objectives to include objective to *“supporting the moves toward a low carbon economy. Relevant to homes, transport systems, heating systems, zero waste strategy, circular economy etc.”* in **Section 5.6**

We recommend amending Environmental Objectives to include an objective regarding the risk climate change poses to the environment and the need to address it through environmental objectives in **section 5.7**.

We recommend amending economic objectives to include reference to low carbon forms of transport in **section 5.8**.

The Preferred Options - Spatial Considerations & Options

We note the risk regarding a spatial approach to onshore wind as housing development is being prioritised over all other forms of development in **Section 6.1**. We welcome the positive reference to ‘energy supply’; however, we believe there is a need to go beyond the provisions of **section 6.19**.

Economy Considerations & Options

As mentioned previously, there is potential for increasing spatial controls on low-carbon economic development under Preferred Option 2 ‘Tourism: TO1: Increasing Visitor Numbers- Impact in Our Sensitive Landscapes’ in **Section 6.117**.

Environment Considerations and Options

Regarding key Issue AB1: Safeguarding our Non-Listed Heritage Assets. “Preferred Option No.1” -the purpose of this policy approach is unclear and we request clarity on how the approach correlates with the existing NIEA-EHD information sources (**Section 6.146**)

We would like clarity on how a detailed Landscape Character Assessment will relate to existing regional policy documents on the landscape and how this will relate to adjoining Council areas (**Section 6.155**)

We would like to raise concerns regarding Preferred Option 2: Key Issue NH1 Protection of Our Most Sensitive Landscape & Seascapes. As noted previously, the implications of this preferred option could be an additional layer of spatial restriction for low carbon development. It is not clear how this designation relates to 'Landscape Character Assessment' and 'Special Countryside Conservation Areas'. We would like a valid definition of 'inappropriate development' and further clarity on how this will be tested.

Again, under **Section 6.161**, we note Preferred Option 3 of Natural Heritage: Protection of Our AONBs and believe that this represents the potential for additional spatial restrictions.

Development in the Countryside policy should not prohibit low carbon infrastructure and should be subject to a different range of planning policy tests (**Section 6.163**)

Infrastructure and Consideration Options

In **Section 6.209** we note that the approach to climate change lacks ambition and has no reference to strategic or ambitious measures. There is no reference to the significant low-carbon economy opportunities that the Council area has already benefited from.

Again, under **Section 6.209** the transportation section does not reference the low carbon economy or electrification of the transport system.

The context of how renewable energy is introduced and discussed (**6.220**) is negative. We believe the provisions of the SPPS should be reviewed to allow a more positive approach to renewable energy. There is an over-emphasis (**6.222**) on the visual impact of wind energy proposals (in terms of the baseline information presented). We recommend that further consideration should be afforded to the positive contribution that wind energy is providing. Renewable energy is again presented in a negative manner in **Section 6.223** and ignores its positive contribution and benefits.

In Section 6.224 we would like clarification on the 'concerns' raised and how the 'concerns' have been reviewed by Council as part of a thorough review process. There is a need to balance policy provision and positive contributions of renewable energy development. This also contradicts the statement that the Council are satisfied with PPS18.

Policy Renewables RN1 Preferred Option 2) represents a departure from regional planning policy i.e. the SPPS and PPS18. We believe there is a requirement for a clear evidence base to justify this approach. There should be a clear strategic approach to onshore wind in order to address a potential risk Councils developing an uncoordinated approach at the local level, which will undermine the achievement of regional policy requirements.

We would like further information on why renewable energy policy is being perceived as less important than other forms of development in/for settlements (6.224). Adequately assessed windfarm/turbine proposals will not give rise to noise and shadow flicker issues.

Further concerns arise in **Section 6.225**. Preferred Option 2 RN2 proposes a buffer around towns and villages where wind turbines will not be permitted. This is an extremely negative approach in the absence of an established evidence base. This will lead to the sterilisation of land for wind energy development, which is a noted departure from the SPPS and PPS18.

We would like evidence for the statement on Climate Change in **Section 6.229**, where it is asserted that it is not *“primary cause of, nor does it create flooding.”*

We note the positive statement on Telecommunications and Other Public Utilities (**6.244**) and query why renewable energy is not as positively welcomed as a public utility that brings economic, social and environmental benefits.

Further concerns arise in **Section 6.254** regarding High Structure in Sensitive Landscapes where the POP fails to address the critical requirement for energy generation: in particular renewable energy. Preferred Option 3 adds another layer of spatial designation onto the additional layers already identified. We do not believe that adequate definition of and justification of this approach has been provided.