NIRIG
NORTHERN IRELAND
RENEWABLES INDUSTRY GROUP
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Draft NIRIG submission to Belfast City Council Preferred Options Paper

20th April 2017

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 Belfast City 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.

We strongly welcome the Council's commitment to establish a Belfast sustainable development framework and emphasise the role the renewable electricity will play in facilitating a sustainable economic framework. Renewable energy represents the single greatest opportunity for Northern Ireland to:

- transition to a low-carbon economy;
- promote energy sustainability; and
- improve security of supply.

Further benefits brought about by a low carbon economy include:

- improvements in air quality;
- the provision of a significant economic boost through job creation, technology innovation and commercial rates; and
- the attraction of foreign direct investment from, for example, major global businesses who now are committed to securing a 100% renewable energy supply between 2020 and 2030[1].

[1] http://re100.org The world's most influential companies, committed to 100% renewable power

Climate and environment

The International Panel on Climate Change (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing and that renewable energy sources such as wind will have to grow from 30% of global electricity at present to 80% by 2050 if we are to limit global warming to below 2 degrees[2] and in accordance with the COP 21 agreement to limit global warming to well below 2°C above pre-industrial levels.

The threat of climate change has led to the UK agreeing steps to reduce emissions by at least 40% by 2030. The NI Executive's Strategic Energy Framework (SEF) has been a positive catalyst for the development of renewable energy sources. Other regional policies, including the Strategic Planning Policy Statement and Regional Development Strategy 2035, all focus on the need to combat climate change and develop and grow sustainably.

The role of low-carbon cities

Cities hold a crucial role in mitigating the effects of climate change. The world's cities account for approximately three-quarters of global greenhouse gas emissions. Energy use, and the behaviour and habits of citizens will dictate whether we are able to reduce emissions to the extent needed to avoid dangerous climate change.

The electricity sector is already rapidly developing away from a reliance on fossil fuels. More than one quarter of Belfast's electricity needs come from renewable sources, thanks to renewable power developments across Northern Ireland. Belfast can lead the way in encouraging low-carbon development by sending out a strong signal on further reductions in the city's reliance on fossil fuels. Electrification of heat and transport could also bring a wealth of economic and environmental benefits to the city.[3]

Converting the transport and heating/cooling industries away from fossil fuels and into increasingly low carbon electricity would be hugely significant in cutting carbon emissions and improving air quality.[4] Increased use of electricity in heating and cooling could create annual savings of €44.7 billion (£37.36bn) across Europe, and Belfast should create the conditions that will enable these savings to be realised locally. Switching to electricity will not only reduce carbon dioxide and fossil fuel imports, it will also provide Belfast with cleaner air. Air pollution levels in Belfast have been branded among the worst in the UK.[5]

In the absence of clear direction on low-carbon cities from national government, cities such as Bristol, Leeds and London have developed city climate strategies, and are now among

[2] IPCC Fifth Assessment Synthesis Report, Intergovernmental Panel on Climate Change AR5 Report

[3] http://www.energylivenews.com/2017/04/19/heat-and-transport-sectors-must-go-electric/

[4] The average electric vehicle in Europe is responsible for producing less than 50g of CO2/km, far below the EU target of 95g by 2020.

[5] http://www.belfasttelegraph.co.uk/news/northern-ireland/belfast-air-pollution-levels-among-the-worst-in-uk-35636923.html

the world's leading sustainable cities. Bristol now has the highest employment rate of all the core UK cities and has been recognised as the 2015 European Green Capital.

We urge Belfast City Council to give serious consideration to developing an ambitious plan for a low-carbon city, which will deliver economic, environmental and health benefits across the city.

The low-carbon economy

The emergence of the low carbon economy represents a sizeable economic opportunity in terms of attracting investment and creating employment. There is potential to develop new businesses and industry sectors linked to climate change. The development of new industries, for example, the clean-tech industry, is a growth opportunity and will enable Belfast to promote and position itself to compete.

Building the city's position as a magnet for Foreign Direct Investment (FDI) will also be supported through a long-term vision for sustainability. The ready availability of a renewable energy supply source is increasingly becoming one of the core attractions for inward investment of large organisations such as Facebook, Google, Amazon and Apple. These companies are looking to divest from fossil fuel industries and are turning to renewable energy to supply this green source of energy as part of their corporate responsibility and commitments.

SCR3 – Electricity and gas infrastructure preferred option

We note the Councils' preferred option to regarding the development of new/replacement or upgrading of existing infrastructure or grids. We would urge that in addition to the LDP seeking to facilitate the development of such infrastructure in an efficient and effective manner, that the LDP actively promotes the adoption and location of technologies that will facilitate an effective and efficient grid. In particular, we suggest that the Council proactively enables the development of storage facilities for electricity.

SCR9 – Mitigating environmental change preferred option / SCR10 – Renewable energy preferred option

NIRIG very much welcomes the Council's acknowledgement of the wider role that the renewable energy sector can play in generating jobs, encouraging investment, protecting against increasing utility bill increases (and the associated negative impact on inward investment), strengthening the grid, reducing harmful emissions and the over-reliance on imported fossil fuels.

We specifically welcome preferred options SCR9 and SCR10 which will enable the Plan to facilitate the development of clean technologies and renewable energy generation in a planned and integrated fashion suitable for the Belfast City Council area.

We suggest that the wording of SCR10 be amended from**:**

'The LDP will review and revise the scope of the existing policies to facilitate the delivery of a planned and integrated renewable energy generation supply appropriate for the urban area.'

to;

'The LDP will review and revise the scope of the existing policies to ***promote*** *the delivery of a planned, and integrated renewable energy generation supply appropriate for the urban area.'*

It is important that all renewable options remain open for consideration. Renewables technology is rapidly changing and increasing in effectiveness. We suggest that the Belfast Agenda retains flexibility in enabling a diverse range and scale of renewable energy generation and storage over the lifetime of the plan. For example, there should be careful consideration of the potential of other policies to impact renewables development: LP16 '*Policy may seek to provide guidance to proposed developers over issues such as* ***height****, massing, scale, proportion*…'. This could impact rooftop solar panels, wind turbines etc.

In another example, LP17 – 6.3.7 (Promote the use of energy efficient, micro-generating renewable energy systems) is to be welcomed but an opportunity would be lost if the focus remained on micro-generation. We believe that the Council Local Development Plan should adopt a proactive approach to the growth development of **all** renewable energy resources, and we would suggest that the steps the Council could take include, but are not limited to:

- a robust and flexible statement of support for all renewable energy development in the Local Development Plan;
- prioritisation of sustainable development across all aspects of the Plan;
- maximisation of resources through the use of the most efficient renewable energy generating technologies;
- proactive engagement and communication, with the support of the renewables industry, with local communities on all medium- and large-scale renewable energy developments;
- an evidence-based approach to planning decisions;
- positive engagement with the renewables industry in addressing any concerns that arise in planning applications;

- use of planning conditions as the best way of addressing planning concerns for individual applications, rather than prescriptive planning controls;

- encouraging a future-proofed energy system.

PPS18

We welcome the statement at 8.7.6 that the "Council's view is that the PPS18 should be retained with some minor changes modifications as identified in the Preferred Option", but we would suggest that clarification is provided here on how the Preferred Option is anticipated to impact upon the existing PPS18 – small changes could very significantly amend its application, and we believe that any changes should serve to facilitate the overall aim of delivering sustainable development.

The current planning assessment system under PPS18 has encouraged significant renewables development. The Sustainability Appraisal Scoping Report states than in 2014 emissions in Northern Ireland had only been reduced by c.50% of what is required by 2025. The Northern Ireland Executive projections suggest that progress is falling short of what is required in order to meet the 2025 target[6], so it is imperative for the Council to play its part in enabling the necessary reductions.

Specifically with regard to the evidence-based approach referenced above, NIRIG believes strongly that each planning proposal should be assessed on its own merits. We have concerns around areas of potential renewable energy development being ruled out by a strategic approach as has been observed in some of the other Councils' Preferred Options Papers to date.

Conclusion

NIRIG believes that the Council has already demonstrated a positive and forward-looking approach to renewables and that this has brought clear benefits to Belfast, with local planning, legal, biodiversity, landscape and visual impact and engineering services being provided by companies in the Belfast area. With increased powers now in place at Council level, an opportunity now exists to build upon these successes. We look forward to supporting the Council in these endeavours.

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Meabh Cormacain
NIRIG

[6] Meeting Carbon Budgets – 2016 Progress Report to Parliament Committee on Climate Change June 2016