

## **NIRIG submission to Newry And Mourne District Council Preferred Options Paper**

**24 August 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 Newry and Mourne District Council on its Local Development Plan. We believe that the Council demonstrates a positive and forward-looking approach to low-carbon growth in this Preferred Options Paper. We look forward to supporting the Council in these endeavours.

### **Local Development Plan**

#### *Regional Policy Context*

We welcome the emphasis on the wider policy framework, which includes the Sustainable Development Strategy. This Strategy clearly sets out principles to guide sustainability for the economy and society and is an important framework for clean growth.

We also welcome the recognition that collaboration with the Republic of Ireland will be required in the key areas of working together for economic advantage, co-ordination of investment in infrastructure and managing our shared environment responsibly. In the context of energy this will be particularly important.

#### *Plan Vision and Strategic Objectives*

We strongly welcome the plan objective priority area to increase production and usage of energy from sustainable sources. The linked activities of increasing promotion of green and

blue infrastructure and promoting the development /implementation of green infrastructure schemes are also very positive.

### *LDP Strategic Objectives*

NIRIG strongly supports the strategic objective to support renewables infrastructure whilst affording protection to the environment

### **Key Issue 9**

#### **Integrated Renewable Energy and Passive Solar Design**

We note the preferred option of integrating renewable energy and/or passive solar design in certain new development e.g. public sector and on private developments over a certain threshold.

We believe that this preferred option sends a strong signal that decarbonisation is a priority for the Council. This will, in turn, facilitate potentially greater innovation from the growing energy storage and energy system management sectors. The low-carbon energy transition will require a step-change in how energy is generated, stored, used and managed. By setting out a positive message on integrated renewables the Council will enable greater inward investment and high skilled jobs, as well as a more robust and flexible electricity network. As noted, this should serve to increase the positive outcomes for the environment, economy and society.

### **Key Issue 18**

#### **Renewable Energy**

We note (7.118) the following statement:

*'for a rolling 12 month period ending March 2017, an average of 27.1% of total electricity consumption in NI was generated from renewable sources located in NI. However, this masks the true extent of renewable generation as in February 2017 38.9% of total electricity consumption in NI was generated from renewable sources.'*

We do not believe that the figures for one month mask the 'true extent' of renewable generation. Much renewable generation is by nature variable throughout the year and only by assessing a rolling average will a true picture be provided. We would urge

the use of annual statistics published every 6 months by NISRA to provide the most representative figure.<sup>1</sup>

We further note (7.119) the comment that

*NIE Networks has indicated that the NI Strategic Energy Framework target of 40% of electricity consumption from renewables by 2020 is now being met*

The Strategic Energy Framework target of 40% **has not yet been met**: official statistics show that 35.2% of electricity consumption is from renewables, although we are hopeful that the 40% figure will be met by 2020. To go beyond this target we will need additional renewable generation to be built, as well as a clear programme of repowering existing sites with more efficient turbines.

7.119 further notes that

*As such there is no system-wide need for further renewable generation being connected to the grid.*

We do not agree with this comment. The electricity system will need much high levels of renewable generation in order to reach national and international targets for decarbonisation. Recognising the challenges of climate change and fossil fuel scarcity, it is expected that other sectors will increasingly turn towards alternative energy sources. In the case of heating and transport, a move to low-carbon sources of energy will mean electrification and therefore increased electricity demand. This represents an opportunity for Councils to adopt proactive policies that will encourage investment in these sectors.

We note the recognition of longer-term policy uncertainty (7.120)

*Whilst there is currently uncertainty over the future renewable energy targets and subsequent need for any additional generating capacity, the Council must nonetheless consider what planning policies it wants to bring forward in respect of renewable energy development*

We welcome the Council's recognition that they must still plan for renewable energy development despite the lack of a regional energy policy after the Strategic Energy Framework 2010-2020. We believe that the next target for renewable generation is likely to require significant additional renewable generation, as well as storage

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<sup>1</sup> <https://www.economy-ni.gov.uk/articles/electricity-consumption-and-renewable-generation-statistics>

technologies, network investment and system flexibility measures. We would like to support the Council in preparing for the future landscape of low-carbon energy.

**Q. Do you agree with the Council's preferred option to carry forward existing planning policy for renewables as contained in PPS18? If not, why?**

Yes. To go beyond the 2020 target of 40% renewable electricity we will need additional renewable generation to be built, as well as a clear programme of repowering existing sites with more efficient turbines. Northern Ireland will need higher levels of renewable energy generation through the development of new projects, and there will also be a need to support the repowering of existing assets in order to create an increasingly low-carbon, modern economy.

**Q. Do you consider that the Council should identify an area(s) where renewable energy proposals would be acceptable in principle? If so, what evidence is there to support the identification of these areas i.e. wind speeds (in the case of wind turbines), suitable grid connection, distance from residential areas, other suitable infrastructure?**

We welcome the proposal for a supportive regime for renewable energy. However, NIRIG has been consistent in its recommendation that decisions on renewables projects should be decided on a case-by-case basis and this is our preferred approach.

NIRIG supports the Strategic Planning Policy Statement (SPPS), which balances the need to protect and conserve our most precious landscapes, and the need to proactively tackle climate change through development of renewable energy sources. The overarching direction of the SPPS provides that local councils should set out policies and proposals in their LDPs that support a diverse range of renewable energy development.

**Q. Do you consider Areas of Constraint for wind turbines should be introduced? If so, why and where do you think they should be located?**

No. We note from reviewing other Council Preferred Option Papers and Local Development Plans that planning authorities are proposing a range of approaches to landscape designation and specifically constraints on renewable generation. Given that we expect to see increasing levels of renewables generation for electricity, heat and transport, we do not believe that additional constraints would fulfil our economic needs, nor would they support the overarching requirement for economy-wide decarbonisation.

We encourage the Council to fully reflect the aspirations of the SPPS:

*'To facilitate the siting of renewable energy generating facilities in appropriate locations within the built and natural environment in order to achieve Northern Ireland's renewable energy targets and to realise the benefits of renewable energy without compromising other environmental assets of acknowledged importance.'*

The SPPS sets out a criteria based approach to assessing renewable energy applications, stating that development that generates energy from renewable sources will be permitted where the proposal and any associated buildings and infrastructure will not result in an unacceptable adverse impact on a number of stated receptors. In order to address these criteria a robust series of assessments (an EIA for more significant developments such as wind farms) is carried out for each application, which identify and assess the likely environmental effects of the proposed development and establish an appropriate range of mitigation measures in order to reduce adverse impacts where possible.

We will shortly be publishing a paper on landscape designation, along with our modelling of 2030 targets for renewables generation. We will share these with you once finalised and hope to meet with you to discuss both papers.

Yours

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Meabh Cormacain

**NIRIG**