

Mid and East Antrim Borough Council
Local Development Plan Team
County Hall
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Ballymena
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By email to: planning@midandeantrim.gov.uk

11th December 2019

Dear Local Development Plan Team,

**MID AND EAST ANTRIM BOROUGH COUNCIL DRAFT PLAN STRATEGY –
SCOTTISHPOWER RENEWABLES CONSULTATION RESPONSE**

We welcome the opportunity to respond to the Consultation on the Draft Plan Strategy for the Local Development Plan 2030.

ScottishPower is a major UK energy company with network, retail and renewable generation interests. It is part of the Iberdrola group, an international utility and the leading wind energy developer worldwide. With over 2GW of operational capacity, our renewables business, ScottishPower Renewables, is helping to drive the Iberdrola Group's ambition of being the Utility of the Future, and is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation.

With over 40 operational windfarms, SPR manage all of our sites through our innovative and world leading Control Centre at Whitelee Windfarm, located outside of Glasgow in Scotland. Our operational onshore windfarm portfolio has delivered millions in community benefits to those communities neighbouring our windfarms and continues to deliver significant employment and economic benefits, locally and nationally. In recent years, we have begun a programme of repowering, as we strive to incorporate the most efficient and cost-effective technologies into existing sites, thereby delivering clean, green energy at the lowest cost to consumers, whilst minimising environmental impacts.

SPR is fully committed to Northern Ireland and in particular the Mid and East Antrim area through our existing Elliot's Hill and Wolf Bog sites. The existing sites are contributing significantly to the mitigation of climate change and have become an accepted feature of the Mid and East Antrim landscape. SPR currently owns and operates a further three onshore windfarms including Rigged Hill, Corkey and Callagheen. Through our long-term presence in Northern Ireland and use of community benefits, we have contributed to a range of groups and organisations including donations made to and managed by the Fermanagh Trust and funding local primary schools. This has supported a range of projects, such as improving community centre accessibility, sponsoring local youth group activities and creating a sensory garden for a playgroup.

Across the UK, public support for wind energy is currently at 78%¹ and local authorities such as Mid and East Antrim have the opportunity to be at the forefront of action to respond to the climate emergency through demonstrating unequivocal support for renewable energy deployment.

We would urge the Council to ensure that the Draft Plan Strategy fully considers the challenges that local communities are likely to face in the future, and would expect that the climate emergency and the legal obligation to meet the net zero target form the basis of this Local Development Plan. All planning policy and decision making should be in line with the net zero targets and policies that promote the required resilience measures, in order to tackle the impacts, for example flood risk, impacts on ecology, which are already being experienced due to climate change. Critical to this will be ensuring that the final Plan Strategy sets out the LDP vision and strategic planning objectives for the area. The council should bear in mind the wider climate change context and the need for local action and support to encourage wide-scale deployment of renewable technologies to meet the Paris Agreement² target of keeping global warming below 2 degrees Celsius.

Against this context it is also our view that the Draft Plan Strategy should do more to establish a positive policy and decision making framework for the range of renewable technologies and renewable energy developments across Mid and East Antrim, including for compatible technologies, such as energy storage, solar and onshore wind, and any supporting infrastructure such as the required grid connections. It is evident that the period from 2020 to 2030 will be crucial in minimising and mitigating climate change impacts. By utilising the potential of the renewable energy sector to deliver multiple benefits across the area, through the creation of jobs, regeneration of communities and environmental benefits, the final LDP can ensure that Mid and East Antrim plays a full part in responding to the climate emergency. It should be recognised by the council within the Draft Plan Strategy that without significant deployment of renewable developments net zero ambitions cannot be achieved.

The Draft Plan Strategy should contain reference to the positive aspects of renewable developments and contain supportive wording that emphasises the need for balanced consideration of new renewable developments, on a case by case basis, underpinned by policies that contribute to the delivery of Northern Ireland's emission reductions targets. The Draft Plan Strategy should seek to recognise the evolving nature of the industry, including taller, more efficient turbines, improved solar PV technology and utility scale battery storage.

The Draft Plan Strategy should also avoid applying any new areas of constraint particularly for onshore wind in the form of any new local landscape or tall structure designations. The acceptability of a development should be considered through the planning process with applications being determined on their merits in the context of criteria based policies. By creating an even more supportive policy context at the LDP level, with particular emphasis on achieving net zero targets, new renewable developments can be facilitated and supported by local authorities.

In addition to new renewable deployment, we anticipate a significant programme of repowering onshore wind sites over the coming years. This is required to maintain, and indeed improve, the renewables contribution to date by incorporating the most efficient technologies into existing sites. We welcome the acknowledgement of repowering in the Draft

¹ BEIS Public Attitudes Tracker (Sept 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/844940/BEIS_Public_Attitudes_Tracker_Wave_31_key_findings.pdf

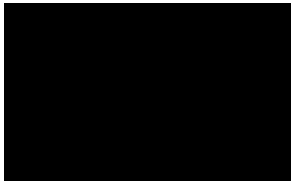
² <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>

Plan Strategy and the favourable consideration subject to relevant policies, although we would emphasise that local landscape and visual considerations should not override the urgent need to deploy a range of renewable technologies on new and existing sites to meet UK net zero targets and to combat global climate change.

This response is supported by specific comments on relevant sections of the Draft Plan Strategy in Annex 1.

I hope the comments provided are helpful and please feel free to contact me on [REDACTED], or at [REDACTED] should you require any additional information.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Planning & Environmental Policy Manager

ANNEX 1: SPR Response to Mid and East Antrim Draft Plan Strategy

The text and table below identify key policy context and wording that should be altered to ensure the Draft Plan Strategy aligns with national policy and emerging trends. In particular, the Draft Plan Strategy should not incorporate text that creates a more restrictive and stringent policy context for the area. Rather, it should ensure alignment with national policy and provide a positive framework for the deployment of renewable energy developments.

Part 9.3 Renewable Energy

Headline text

Introduction

We recognise and support the majority of the content in the headline text of Part 9.3 Renewable Energy, in particular the clarity surrounding climate change mitigation and greenhouse gas emissions reductions. We would urge that the Draft Plan Strategy contains reference to agreed UK net zero targets and that it acknowledges that this is a legal obligation. Net zero targets and the climate emergency should be central to the LDP and there should also be acknowledgement of emerging Northern Ireland specific targets likely to be contained in a new Strategic Energy Framework.

It is therefore vital that the key message on renewable energy delivery is followed up by clear supportive policies and deliverable actions that can enable deployment in the right locations across the area. This means that policy constraints should be kept to a minimum within the final Plan Strategy ensuring an emphasis on positive wording aimed at facilitating and encouraging renewables development. This includes associated infrastructure, mitigation where required to offset any effects, encouraging good site design, and affording material weight in decision making to the wider environmental and socio-economic gains which renewable projects can deliver.

Policy Text

Draft Plan Strategy Policy RE1 Renewable Energy Development Policy text deletions (struckthrough text) and suggested text additions (in bold)	Reasons for SPR changes
<p>Outside of Special Countryside Areas</p> <p>A proposal for a renewable energy development together with any associated buildings and infrastructure, will be permitted where it meets the General Policy and accords with other provisions in the LDP. In addition, the proposal must meet all of the following criteria:</p> <p>a) it will have an acceptable effect on visual amenity or landscape character;</p> <p>b) it will not cause significant harm to the any potential effects on the safety or amenity of any sensitive receptors (including future occupants of committed developments) arising from noise; shadow flicker; ice</p>	<p>The deletions and changes will ensure a more positive consideration of renewable energy developments, in particular through the recognition that solutions can be found through design and mitigation, whereby any potential effects can be reduced.</p> <p>SPR consider that renewables policies should incorporate a presumption in favour of</p>

<p>throw; and reflected light will be considered and mitigated applied where necessary;</p> <p>c) it will not unacceptably restrict any potential effects on public access to the countryside, or recreational/tourist use of the area will be considered and resolved through good site design and/or mitigation, with any proposals to make improvements to recreational access being considered;</p> <p>d) any potential effects will no part of it will have an unacceptable impact on roads, rail or aviation safety will require to be mitigated where required;</p> <p>e) it will not have an unacceptable adverse impact any potential effects on nature conversation and biodiversity are fully considered and mitigated where necessary.</p> <p>f) it avoids active peatland, unless it is demonstrated there are imperative reasons of overriding public interest as defined under The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 as amended;</p> <p>g) it will not have an unacceptable adverse impact any potential effects on air quality, water quality and quantity will be fully considered and mitigated where necessary;</p> <p>and</p> <p>h) it will not prejudice limit the operational effectiveness of existing or approved energy infrastructure.</p> <p>A cautious approach detailed assessment and consideration of renewable energy development proposals will apply be undertaken within areas of the countryside that are valued for their distinctive landscape and environmental qualities on a case by case basis.</p> <p>The wider environmental, economic and social benefits of all proposals for renewable energy projects are material considerations that will be given appropriate weight in determining whether planning permission should be granted. The need to promote and sustain renewable development growth is essential if we are to meet the UK's Net Zero obligation, and limit the effects of Climate Change.</p> <p>Where any proposal is likely to result in unavoidable damage If any potential adverse effects are identified during its a renewable development's installation, operation or decommissioning phases, then the applicant must indicate how such effects will be minimised and mitigated, including details of any compensatory measures, best practice procedures and set out any further areas of environmental and</p>	<p>development and should not impose onerous limitations on wind turbines or other technologies nor seek to limit the areas for possible deployment.</p> <p>We would expect that this constraint on Special Countryside Areas be removed from the plan, we are not in receipt of any evidence used in support of identifying this new area of constraint, and any potential evidence base has not been tested, nor has it been open to a consultation exercise.</p>
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<p>ecological net gain which can be realised, such as a habitat management plan or the creation of a new habitat. Applicants will also be required to ensure that upon decommissioning, all above ground redundant structures, plant, buildings and associated infrastructure shall be removed and the site restored to an agreed standard appropriate to its location. These matters will need to be agreed with the Council before planning permission is granted and appropriate conditions applied to any approval.</p> <p>A proposal for the re-use, refurbishment or repowering of an existing renewable energy development in order to extend its lifespan will be encouraged and considered favourably subject to meeting the relevant criteria within this policy.</p> <p>Wind Energy Development In addition to the above, a wind energy development proposal must also meet all the following criteria: i) the development proposal has taken into consideration the cumulative effects of existing wind turbines, including consented developments, and those which are the subject of existing planning applications as relevant; extant permissions and undetermined applications; j) the development will not create a significant risk of landslide or bog burst; k) no part of the development will give rise to should be designed to limit any electromagnetic interference to communications installations; radar or air traffic control systems; emergency services communications; or other telecommunication systems with agreed mitigation being put in place where required; and l) a separation distance of 10 times rotor diameter to any occupied or temporarily unoccupied or approved dwelling outside the applicant's control can be achieved. A minimum distance of not less than 500m (from residential dwellings) will generally apply to wind farms, with single turbines assessed on a case by case basis.</p> <p>Ground Mounted Solar Photovoltaic Installations A solar development proposal will be permitted provided it meets both the Renewable Energy Development criteria and the General Policy. Large scale solar farms will be permitted within the Antrim Coast and Glens AONB.</p>	
<p>CS3 Areas of Constraint on High Structures Areas of Constraint on High Structures (ACHS) are designated at the following locations (refer to District Proposals Maps) in order to protect the distinctive and vulnerable landscapes and the environmental assets</p>	<p>We dispute the need for Policy CS3 as this is effectively a new designation/area of constraint which is being afforded policy protection. Supporting</p>

<p>associated with the natural and historic environment of the following areas:</p> <ul style="list-style-type: none"> • Islandmagee East and Whitehead • Slemish Mountain • Eastern Garron Plateau and Scarp Slopes • Knockdhu, Sallagh Braes, Scawt Hill to Glenarm Headland • Carrickfergus Escarpment • Lough Beg and the Lower Bann River Corridor <p>Structures up to 15m in Height Within all of these areas, development proposals for wind turbines, electricity pylons or telecommunications masts/equipment less than 15 metres in height above original ground level will be permitted, provided they:</p> <ol style="list-style-type: none"> i. are designed and located to minimise any significant effects on the designated area ii. do not interrupt key views from public vantage points; iii. are not visually prominent in the landscape; and iv. can be integrated into the landscape in a satisfactory manner. <p>Structures above 15m and up to 25m in Height In exceptional circumstances, structures that exceed 15m may be permitted subject to a maximum height of 25m where it can be demonstrated that:</p> <ol style="list-style-type: none"> i. they have been designed and located to minimise any significant effects on the designated area ii. iii. there is a need for a structure of this height; iv. there are no suitable alternative sites located outside of the designated area; and v. appropriate mitigation measures are in place to minimise the impact of the proposed development on the designated area. <p>Structures above 25m in Height Structures that exceed 25m will only be permitted if it can be clearly demonstrated that:</p> <ol style="list-style-type: none"> i. the proposal is of such regional significance as to outweigh any detrimental impact on the landscape character and/or environmental integrity of the designated area; and ii. appropriate site design and mitigation measures are in place to minimise the impact of the proposed development on the designated area. <p>Within Areas of Constraint on High Structures, any other form of energy infrastructure development,</p>	<p>evidence requires to be produced which sets out how this area of constraint/area of protection was arrived at, this needs to be consulted upon so any evidence base can be fully tested. This also introduces a new constraint on renewables development against a legal obligation to meet a Net Zero target, and in the context of a climate change emergency. Rather than individual cases for any tall structures, which will be predominantly telecoms masts and wind turbines should be considered on their merits moving forward against this revised context of Net Zero/Climate Emergency.</p> <p>If the Council wish to proceed with Policy CS3 then we have identified potential deletions and amendments in the adjacent column.</p>
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<p>irrespective of its height, will not be permitted where it is visually prominent, or will otherwise adversely impact on landscape character and/or the environmental integrity of these areas.</p> <p>All development proposals will be required to meet the General Policy and accord with other provisions of the LDP.</p>	
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