

## Mid and East Antrim Borough Council draft Plan Strategy: Proposed Modifications

### Introduction

RenewableNI appreciates the opportunity to respond to the proposed modifications to the Mid and East Antrim Borough Council (Council) draft Plan Strategy (dPS) Proposed Modifications.

RenewableNI is the new name for NIRIG and is the trade association and voice for the renewable electricity industry in Northern Ireland. We represent over 30 businesses, fostering knowledge exchange, sharing best practice and supporting policy development. Engaged in wind, solar, tidal and battery storage, our members make up a large majority of the renewable industry supply chain.

RenewableNI welcomes the fact that a number of modifications reflect changes sought in our submission under our old name, NIRIG, your reference MEA-DPS-050. However, as we will outline, we feel these changes do not sufficiently address our concerns and it remains our view that a number of aspects of the dPS are unsound.

This response should be read in conjunction with MEA-DPS-050 in respect to the consultation on the draft Plan Strategy (dPS), dated December 2019. The original submission is included at the Appendix for reference.

### Renewables in MEABC

Currently there is 241MW of renewable electricity capacity in the MEABC area with another 166MW 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 projects also make a contribution to the community in the form of benefit schemes.

### Current Benefits

Rates from wind farms: £657k (2017/18)  
Community benefits from wind farms: £95k per year

### Pipeline Wind

Consented: 50MW  
In planning: 26MW  
Pre planning: 90MW  
Total: 166MW

## **Pipeline Storage:** 100MW

Projects in the pipeline have the potential to increase renewable electricity output in MEABC by almost 70% with a direct financial benefit of circa £0.5m per year to the Council and the community. NIRIG would anticipate that in 2020 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.

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.

## **Net Zero**

The UK Government has set in legislation a requirement for a 'net zero' economy by 2050. 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.

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 dPS and its vision.

The dPS 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**

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. 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 perceived

negative impacts. The Council should note that as well as the legitimate concerns some may have, there is clearly widespread support for renewables.

## 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 dPS 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.

## Proposed Modifications

### **Policy CS2 Special Countryside Areas**

Proposed Modification - PM-018

Despite the proposed modification, Policy CS2 still does not reflect the SPPS by providing for sustainable development in the countryside, nor is there any evidence base provided for the policy. Therefore, it continues to fail soundness test CE2.

### **Policy CS3 Areas of Constraint on High Structures**

Proposed Modifications - PM-019, PM-020, PM-021, PM-022, PM-023, PM-024, PM-025, PM-026, PM-027, PM-028, PM-029, PM-030, PM-031, PM-032, PM-033, PM-034.

Proposed modifications seeks to add an additional descriptor to the high structures policy by including references to “obstructive development” and associated justification and amplification text amendments.

RenewableNI notes that Council has responded to the Department for Infrastructure (DfI) submission and removed a number of specific references energy. However, the intent to greatly

restrict renewable development remains clear and the addition of “obstructive development” only enhances this.

Policy CS3 therefore continues to contradict the SPPS and PPS18 without providing any evidence base for doing so. We therefore object to this draft policy and associated modifications as proposed, as it is unsound and it fails tests CE1, CE2, CE3 and C3.

## **Policy RE1 Renewable Energy Development**

**PM-126** – RenewableNI welcomes this proposed modification however the text should be made fully consistent with the SPPS phrasing and refer only to ‘*occupied property*’.

**PM-130** – RenewableNI welcomes the additional text in relation to co-location. However there remains an absence in the dPS in respect of standalone battery storage or hydrogen projects. It is important that there is clear policy in relation to these types of projects as they will become increasingly common within the lifetime of the strategy.

Despite the modifications, it is considered that the draft Policy remains in conflict with the key objectives of the dPS in respect of delivering renewable sources of energy and the requirement for climate change mitigations. The plan is incoherent as the objectives are not carried through to the implementation of the draft policy and is in contradiction of the SPPS and the RDS. The policy therefore fails soundness tests CE1, CE2, CE3 and C3.

## **Policy TOC1 Telecommunications Development and Overhead Cables**

Proposed modifications – PM-123, PM-133, PM-134, PM-135, PM-136, PM-137

The proposed modifications provide clarity and correction in relation to policy CS3 modifications. However, they do not address our original objection, that the policy acts as a blanket ban of telecommunications development in SCAs, without any allowance for exemptions or case by case considerations. It therefore continues to fail soundness tests CE2 and CE3.

## **Conclusion**

As currently drafted the dPS is in contradiction to existing and emerging policy in relation to energy and decarbonisation. No level of government, no geographical area and no sector of our society can exempt itself from the moral imperative and the legal requirement to transition to net zero. That does not and should not mean that there is a free for all for renewable development, good planning must continue to be followed.

However, as the SPPS recognises, the presumption should be in favour of renewable development with the onus being on the objector to demonstrate why a particular project should not be approved. Taking account of current and the proposed new restrictions of the dPS combined, only 0.6% of the Council area is available for wind development. This is, in effect, a presumption against renewables and therefore the dPS as currently drafted is unsound.

## Appendix

### **NIRIG submission to Mid & East Antrim Borough Council draft Plan Strategy**

11<sup>th</sup> December 2019

**The Northern Ireland Renewables Industry Group (NIRIG) represents the views of the renewable electricity industry in Northern Ireland. We provide 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 Mid & East Antrim Borough Council (MEABC) on its draft Plan Strategy (dPS) for the Local Development Plan (LDP) 2030, and we look forward to engaging with the Council as the Plan progresses.

#### ***Renewables in MEABC***

Currently there is 241MW of renewable electricity capacity in the MEABC area with another 166MW 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 projects also make a contribution to the community in the form of benefit schemes.

#### **Current Benefits**

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#### **Pipeline Wind**

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## **Pipeline Storage**

Pre planning (storage): 100MW

Projects in the pipeline have the potential to increase renewable electricity output in MEABC by almost 70% with a direct financial benefit of circa £0.5m per year to the Council and the community. NIRIG would anticipate that in 2020 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.

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.

## **Net Zero**

The UK Government has set in legislation a requirement for a 'net zero' economy by 2050. 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 45% of our electricity consumption from renewables. NIRIG 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 in 2020, Northern Ireland is yet to set a target. However, we have an obligation to play our part in achieving net zero with a duty on all public authorities to facilitate this.

NIRIG therefore urges MEADC 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).

The Borough is home to two of Northern Ireland's three power stations, but there will be restrictions to the availability of Kilroot power station after 2021 resulting from the Industrial Emissions Directive post-2021 and it will shut down at the beginning of 2024. Facilitation of renewable electricity as a low-cost, low-carbon energy source that provides local jobs and investment, should be a priority for all Council areas, particularly those rich in natural resources such as wind and tidal energy. To meet increased demand for renewable energy in the context of Net Zero, there will be a focus on electrification of our heat, and transport systems, and fill the gap left by the closure of these power stations.

### ***Public Support for Renewables***

With all energy infrastructure projects there is likely to be some level of local concern. NIRIG 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 93% of the public in Northern Ireland are in favour of renewables, the highest level of any region in the UK.

### ***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, both large employers in County Antrim. 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.

NIRIG 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***

NIRIG 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 (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.

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***

NIRIG 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.*

NIRIG is concerned that in its draft Plan Strategy MEABC has added a significant number of additional criteria under which renewable applications could be refused and the draft Plan could be outwith the requirements of regional policy.

NIRIG 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 against the climate emergency and the potential environmental devastation of not meeting our net zero requirements.

### ***Loss of Presumption in Favour of Renewables***

NIRIG is greatly concerned that the presumption in favour of renewables which was stated in the Preferred Options Paper, in accordance with the SPPS, is not explicit in the draft Plan Strategy, nor does it appear to be reflected by the approach of the draft plan. Instead two new presumptions against renewable development have been introduced; a presumption against renewable development, and associated electricity infrastructure, in Areas of Constraint on High Structures (ACHS) and in Special Countryside Areas (SCA).

Policy RE1 acknowledges;

“By its very nature the wind resource is likely to be greatest in upland areas, which may be particularly sensitive in terms of their landscape, cultural heritage and nature conservation value. It is also recognised that larger-scale wind energy developments are likely to be visible over distances.”

However the dPS in being weighted heavily against the development of renewables, lacks the balance that is evident in the SPPS. The PS must recognise that the climate emergency will have a devastating impact on conservation value compared to the relatively benign impact of a wind farm. Instead the draft plan seeks to heavily restrict renewable development and prohibit it almost entirely in ACHS and SCAs.

NIRIG believes that the Council should take a more facilitative approach, allowing applicants to demonstrate how the impacts of a development can be mitigated on a case by case basis.

We would like to see the evidence base used to produce the draft policy on ACHS and SCAs. These designations are not recognised within the SPPS and the dPS fails to provide evidence that they are required. ACHS were not included in the Preferred Options Paper (POP) and therefore have not been consulted on and we are struggling to understand the reason for their inclusion. NIRIG contends that the Area of Outstanding Natural Beauty designation is sufficient for landscape protection and is unconvinced that these new designations serve any legitimate environmental purpose.

Draft policy TOC1 will further hamper the deployment of renewables as it appears to put a blanket ban on telecommunications developments, which may be required to facilitate new renewables on to the grid, within SCAs. The policy should facilitate development on a case by case basis and allow for telecommunications infrastructure where a need for doing so at that precise location can be demonstrated.

NIRIG calls on MEABC to rethink these designations, at least allowing exemptions for the facilitation of renewables in line with the strategic objectives of the SPPS, RDS and SDS. Applications for renewable projects should be considered on a case by case basis allowing the applicant to demonstrate how the project can co-exist with the natural landscape.

## **Separation Distances**

### **The SPPS states;**

*6.227 For wind farm development a separation distance of 10 times rotor diameter to occupied property, with a minimum distance not less than 500m, will generally apply.*

NIRIG recognises the minimum distance of 500m from an occupied property in the SPPS but notes that the dPS seeks to add additional requirements. RE(I) includes dwellings which are “temporarily unoccupied”. This requires clearer definition as is open ended as currently drafted with no clarity as to how it will be interpreted.

MEABC has also required a setback distance from “approved developments”. As MEABC will be aware, planning applications are often speculative and may take many years to come to the fore, if at all, and therefore it is not prudent to restrict other developments on this basis.

NIRIG supports the policy as outlined in the SPPS and would encourage the Council not to deviate from this.

## **Repowering**

Repowering represents a fantastic opportunity to increase the output from existing wind farms often by replacing older turbines with a smaller number of larger, modern, more efficient turbines. NIRIG welcomes the positive approach that the draft plan takes to repowering. 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.

## **Solar**

The PS should make direct reference to the potential that solar PPAs 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 PS 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.

While understanding the preference for solar farm developments on brownfield sites outlined at 9.3.14 in the dPS, in reality such sites are likely to be too small for solar farms as well as being prohibitively expensive. Along with wind energy, solar is one of the cheapest forms of new electricity generation. Solar will play a vital role if we are to fully decarbonise our power supply at a low cost to the consumer.

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

## ***Soundness***

**Draft policy RE1** adds additional restrictions to the deployment of renewables in contradiction of the SPPS, RDS and the main objectives of the plan. RE1 therefore fails soundness tests CE1, CE2, CE3 and C3.

**Draft policy TOC1** fails to provide for exemptions in SCAs where telecommunications infrastructure developments may be included. It therefore fails soundness tests CE2 and CE3.

**Draft Policy CS2** seeks to restrict development with no exemptions for renewables. Nor does it provide an evidence base or justification for a designation outside those within the SPPS and therefore fails soundness test CE2.

**Draft Policy CS3** conflicts with and is inconsistent with the approach set out in the SPSS and PPS18 and is not based on a robust evidence base. It therefore fails tests CE1, CE2, CE3 and C3.

## *Conclusion*

NIRIG encourages Mid & East Antrim Borough 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.



**Steven Agnew**  
Head of NIRIG