

Proposed Changes to the Fermanagh & Omagh District Council LDP

SPR Planning Policy <SPRplanningpolicy@scottishpower.com>

Thu 03/12/2020 13:08

To: Development Plan <developmentplan@fermanaghomagh.com>

Cc: [Redacted]

1 attachments (499 KB)

FO_LDP_ProposedChanges_3Dec2020.pdf;

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Dear Planning team,

Please find our attached ScottishPower Renewables response to the Proposed Changes to the Fermanagh & Omagh District Council LDP.

We would appreciate acknowledgement of receipt of our submission and would welcome further dialogue on the identified issues.

Kind regards,

[Redacted Signature]

cid:image001.png@01D65F71.53
222C60

[Redacted Name]

Planning & Environmental Policy Analyst

ScottishPower Renewables
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**SCOTTISHPOWER
RENEWABLES**

Local Development Plan
Strule House
16 High Street
Omagh
Co Tyrone
BT78 1BQ

By email to: developmentplan@fermanaghomagham.com

3 December 2020

Dear LDP Team,

**FERMANAGH AND OMAGH DISTRICT COUNCIL LOCAL DEVELOPMENT PLAN
PROPOSED CHANGES – SCOTTISHPOWER RENEWABLES REPRESENTATION**

We welcome the opportunity to respond to the Consultation on the Proposed Changes in preparation for the Local Development Plan.

ScottishPower is a major energy company with network, retail and renewable generation interests in both the UK and Ireland. 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 (SPR), 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 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.

SPR is fully committed to Northern Ireland and in particular the Fermanagh and Omagh area through our existing 17MW Callagheen site. The existing site is contributing significantly to the mitigation of climate change and has become an accepted feature of the Fermanagh and Omagh landscape. SPR currently owns and operates a further four onshore windfarms in Northern Ireland including Rigged Hill, Corkey, Elliots Hill, and Wolf Bog. 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.

June 2020 government polling shows that 80% of the UK public support renewable energy¹, and local authorities such as Fermanagh and Omagh District Council can be at the forefront of action to respond to the green recovery and climate emergency through demonstrating

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906452/BEIS_PAT_W34_-_Key_findings.pdf

unequivocal support for renewable energy deployment. SPR is committed to playing our part in supporting a green economic recovery in the UK, as set out in our recently published document, *Unlocking Net Zero: 10 Practical Steps for a Green Recovery*².

It is evident that the period from 2020 to 2030 will be crucial in minimising and mitigating climate change impacts. It is our view that Local Development Plans across Northern Ireland must establish a positive policy and decision-making framework for new renewable energy developments which support the use of the most efficient technologies including standalone and co-located energy storage, solar and onshore/offshore wind. Using the potential of the renewable energy sector to deliver multiple benefits across the area, can ensure Fermanagh and Omagh District Council plays its full part in responding to the climate emergency.

In recent years, we have begun a significant programme of repowering onshore wind sites, where 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. This is required to maintain, and indeed improve, the renewables contribution to date by incorporating the most efficient technologies into existing sites. The proposed changes to the LDP should contain recognition that existing sites have been determined to be acceptable for wind energy developments and should indicate a preference for a streamlined consenting route for repowering and life extension. This should include acknowledgement of the benefits of co-located renewable technologies and the need for proportionate Environmental Impact Assessments to ensure expeditious consenting to meet net zero targets and delivery of a modern energy system.

This response is supported by specific comments on relevant proposed changes in Annex 1.

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

Yours faithfully,

[REDACTED]

[REDACTED]
Planning & Environmental Policy Analyst

² https://www.scottishpower.com/pages/green_recovery.aspx

ANNEX 1: SPR Response to Fermanagh and Omagh District Council LDP Proposed Changes

Draft Policy RE01: Renewable and Low Carbon Energy Generation

Proposed Change Ref 116, Policy RE01

The proposed change “n),” changing the separation distance of 10 times the rotor diameter from a “dwelling” to a “property” does not accord with the Strategic Planning Policy Statement (SPPS) for Northern Ireland. Paragraph 6.227 of the SPPS states “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.”

Removing the word “occupied” from this sentence would be overly restrictive and not in accordance with the SPPS. The use of the word “property” alone creates a vague description that could be misinterpreted to mean the boundary of a field or farm shed. To avoid ambiguity, we would ask that this be amended to refer to “continuously occupied residential property.”

Paragraph 6.229 of the SPPS provides further context, stating that factors to “be assessed in accordance with normal planning criteria, including such considerations as: access arrangements, road safety, good design, noise and shadow flicker; separation distance; cumulative impact; communications interference; and the inter-relationship between these considerations.” This case by case criteria-based approach to assessment also ensures good acceptable design.