

Response to Proposed Changes to the draft Plan Strategy

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To: Development Plan <developmentplan@fermanaghomagh.com>

📎 1 attachments (181 KB)

RenewableNI response to FODC dPS Proposed Changes.pdf;

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Please see attached response to the proposed changes to the Fermanagh and Omagh District Council draft Plan Strategy, on behalf of RenewableNI (formerly NIRIG).

Should you have any queries about the attached response, please do not hesitate to contact me.

Regards,



Head of

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3rd December 2020

Our Ref: DPS226

Your Ref: ER128 LDP2030 Re Consultation Proposed Changes

RenewableNI is the new name for NIRIG. We are the trade association and voice for the renewable electricity industry in Northern Ireland. RenewableNI represents over 40 businesses, fostering knowledge exchange, sharing best practice and supporting policy development.

We welcome the opportunity to respond to the proposed changes to your draft Plan Strategy. This response is in addition to our submission of 21st December 2018 under our previous name.

Before commenting on the specific policy changes proposed to the draft Plan Strategy we have outlined below some of the benefits that investment in renewable electricity generation has brought to the Fermanagh & Omagh District Council Area and Northern Ireland as a whole.

Renewables in Fermanagh & Omagh

Currently there is 457MW of renewable electricity capacity in the Fermanagh & Omagh District Council area with another 229MW 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: £4.2m (2017/18 figures)

Community benefits from wind farms: £625k per year

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Projects in the pipeline have the potential to increase renewable electricity output in Council by approximately 50%, with a direct financial benefit of circa £2.4m per year to the Council and the community.

RenewableNI would anticipate that in 2021 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. We note the Economy Minister, Diane Dodds' statement that the target for renewable electricity will not be less than 70% by 2030. This will require at least a doubling of renewable electricity capacity across Northern Ireland as the electrification of heat and transport creates increased demand.

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 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).

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 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.

Proposed Changes to the Fermanagh & Omagh draft Plan Strategy

We note there are a number of changes in respect of renewable energy, many of which we are content with. The comments below are in respect of proposed change reference 116.

1. The prohibition of renewable development on active peatlands “unless imperative reasons of overriding public interest”.

RenewableNI is supportive of the principle of this proposed change reflecting as it does a similar provision in the Strategic Planning Policy Statement (SPPS). However, we fear that the current drafting may cause confusion and therefore fail to achieve its intended objective.

Currently the proposal reads:

“The Council will permit proposals for the generation of energy from renewable or low carbon sources and any associated buildings and infrastructure, where it can be demonstrated that there will be no unacceptable adverse impact upon:

- i) any renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest”

We suggest the following alternate wording:

- i) “active peatland. Renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest.”

2. Extension of cumulative impacts from developments which are “operational and approved” to also include applications which are “valid but undetermined”

Again, RenewableNI supports the principle of this proposal as it is line with best practice and the policy wording in PPS18 but weight given to undetermined projects should be limited in the decision making process.

This has been clarified in appeals such as Dunmore where the Commissioner stated “*However, the wind farm at Dunbeg has been refused by the Department, and whilst it is the subject of an undetermined planning appeal, there is no certainty that it will be approved. On this basis I do not attach any weight to the cumulative impact of the appeal proposal with the proposed wind farm at Dunbeg.*”

Given the lengthy timescale for determination of planning applications, this policy wording could potentially confuse things where subsequent wind farm applications are submitted, if assessments are then required to take account of all valid but undetermined applications.

Therefore, RenewableNI believes that further detail outlining how projects in planning will be treated in respect of the assessment of cumulative impact. It is our view that this is required to ensure the policy is not overly and unnecessarily restrictive.

3. Change to the measuring of separation distances from “approved dwelling” to “approved property”.

RenewableNI is unsure as to the policy intention of this proposed change. We are content with the original wording which reflects the SPPS and reject this proposed change.

However, if the word “property” is to be retained, we believe further definition is needed.

To provide clarity and to prevent the change being unduly restrictive, RenewableNI proposes that “approved property” should be replaced with “continuously occupied residential property”.

The purpose of separation distances is to mitigate any potential impact on people, not buildings. The revised wording we have suggested would prevent unoccupied properties such as farm sheds, warehouses or similar structures, which would not be affected by the citing of a turbine, from being included in the provision.

Conclusion

We appreciate your consideration of this response and look forward to working with the Council further in the development of a Plan Strategy that will benefit the community, the economy and the environment of Fermanagh and Omagh.

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