

## **NIRIG submission to Derry City and Strabane District Council Preferred Options Paper**

**12 April 2017**

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 Derry City and Strabane District Council on its Local Development Plan and appreciates the level of stakeholder interaction in development of the plan.

Renewable energy represents the single greatest opportunity for Northern Ireland to;

- transition to a low-carbon economy;
- promote energy sustainability and;
- improve security of supply.

Further benefits to a low carbon economy include;

- improvements in air quality;
- the provision of significant economic boost through job creation, commercial rates and community benefit and;
- the attraction of foreign direct investment who are actively seeking pure play renewable energy sources.

We encourage the Council to consider the wider role that the renewable energy sector can play in generating jobs, encouraging investment, reducing harmful emissions and contributing to the economic and environmental outcomes of the future Local Development Plan.

Specifically, we believe that the Council should adopt a proactive approach to the development of renewable energy resources, including new technologies such as storage, and also development of the electricity network. Steps that the Council could take include, but are not limited to:

- a robust and flexible statement of support for renewable energy development in the Local Development Plan;
- prioritisation of sustainable development across all aspects of the plan;
- maximisation of resources through use of the most efficient wind turbines;
- proactive engagement and communication with local communities on renewable energy developments, with the support of the industry;
- an evidence-based approach to planning decisions;
- positive engagement with the industry in addressing any concerns that arise in planning applications;
- use of planning conditions as the best way of addressing planning concerns for individual applications, rather than prescriptive planning controls;
- facilitating repowering of renewable energy sites, and;
- encouraging a future-proofed energy system,

We believe that the Council has already demonstrated a positive and forward-looking approach to renewables and that this has brought clear benefits to the area. With increased powers now in place at Council level, an opportunity now exists to build upon these successes. We look forward to supporting the Council in these endeavours.

### **Planning policy context**

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.

We encourage the Council to reflect the aspirations of the SPPS in the plan policies:

***‘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.

A variety of statutory and non-statutory bodies with expertise in each area of assessment are required to provide expert review on individual parts of the assessment and feedback to the planning authority to inform the final planning decision.

NIRIG fully recognises the need to protect the natural environment from inappropriate forms of development. We support the criterion and tests already enshrined within the Strategic Planning Policy Statement and in Planning Policy Statement 18, which successfully balance the need for renewable energy with the need to protect these resources.

NIRIG recognises that a robust and efficient plan lead system is required in Northern Ireland. Local Development Plans will be key to responsible development and the delivery of the wide reaching economic, social and environmental benefits of our indigenous renewable resources.

### ***Resources***

The Council area has some of the best renewable energy resources in Northern Ireland, and indeed in Europe. This is reflected in the significant contribution that the Council is making to sustainable development through renewable electricity provision, including large- and small-scale wind, and solar power. The Council holds 155MW of large-scale wind (representing just under 10% of the NI total), and has a further 180MW either in planning or consented, with additional technologies such as solar energy growing in importance.

As the Council has secured growth in renewable energy, these projects, in turn, have provided significant benefit to the Council, with approximately £1.8million in rates contributions in 2015/16 from 10 operational wind farms. Each wind farm also has a community benefit scheme, which is a mechanism for acknowledging the contribution that local communities are making to regional energy targets.

### ***Climate and environment***

The International Panel on Climate Change (IPCC) argues that the window for action on climate change is rapidly closing. Renewable energy sources such as wind will have to grow

from 30% of global electricity at present to 80% by 2050 if we are to protect against global warming in accordance with the COP 21 agreement<sup>1</sup> to limit warming to less than 2°C above pre-industrial levels.

The threat of climate change has led to the UK agreeing steps to reduce emissions by at least 40% by 2030. The UK Government and NI Executive plan to transition to a low carbon economy through the growth of renewable technology. The NI Executive's Strategic Energy Framework (SEF) has been a positive catalyst for the development of renewable energy sources and has contributed to a strong foundation of renewable energy development. Regional policies, including the Strategic Planning Policy Statement and Regional Development Strategy 2035, all focus on the need to combat climate change and develop and grow sustainably.

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 increased electricity demand. This represents an opportunity for a resource-rich area like DCSDC to adopt proactive policies that will encourage investment in these sectors.

### ***Secure and cost-effective electricity***

A secure, low-carbon electricity system in Northern Ireland at the lowest cost to consumers can only be achieved by retaining onshore wind in the generating mix. Renewable electricity will reduce the wholesale costs of electricity by £19 million each year between 2013 and 2020 (DETI, 2015). Decarbonisation of our electricity sector is by far the cheapest mechanism of decarbonising our energy system: heat, agriculture and transport decarbonisation are all much more expensive, particularly in a rural, agricultural economy such as NI.

Onshore wind is the cheapest option for any new electricity generation<sup>2</sup> and the industry has successfully innovated to the point where the support scheme for renewable electricity (NIRO) has now closed.

Connection to the electricity grid is also a vital part of renewable energy development. Further development of the transmission and distribution networks is required in order to support electricity generation from renewable energy. This should also be recognised and facilitated through the LDP.

Innovations, such as energy storage, will also play a key role in increasing system stability and help the electricity system be more economically and securely managed. We would

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<sup>1</sup> IPCC Fifth Assessment Synthesis Report, Intergovernmental Panel on Climate Change AR5 Report

<sup>2</sup> <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52014DC0015>

encourage the Council to support and actively promote suitable infrastructure proposals coming forward in this arena.

### ***Jobs & Employment***

The renewable industry can play a key role in facilitating job creation and promoting diverse employment options. The renewable energy industry makes a substantial contribution to the local economy in terms of job creation and sustaining employment. In one very simple example, the operations and maintenance (O&M) requirements of turbines means that for every second Enercon turbine constructed, one skilled long-term O&M job is created, primarily in rural areas.

Local construction companies have upskilled their staff and created jobs in engineering and construction, even during economic downturns, by providing services for the wind industry. Companies such as Adman Civil Projects Ltd and William & Henry Alexander (Civil Engineering) Ltd are employing growing numbers of skilled staff to support the wind industry. Pouring wind turbine bases for wind farms in County Londonderry represented £10million of contracted value for a local construction firm in 2015/16: 30% of company turnover.

### ***Foreign Direct Investment***

The ready availability of a renewable energy supply source is increasingly becoming one of the core attractions for inward investment from organisations such as Facebook, Google, Amazon and Apple. These companies are looking to divest from fossil fuel industries and are turning to renewable energy to supply green energy as part of their corporate responsibility and commitments.

### ***Decarbonising the Economy and Fossil Fuel Divestment***

Fossil fuel divestment and investment in climate solutions is the removal of investment assets including stocks, bonds, and investment funds from companies involved in extracting fossil fuels, in an attempt to reduce climate change by tackling its ultimate causes. Many companies are actively seeking renewable electricity to supply their businesses by setting up power purchase agreements (PPA's) e.g. the recent PPA with Facebook to supply renewable electricity from Irish wind farms.

NIRIG believe it is important that Northern Ireland and DSDC positions itself to avail of the opportunities that the inevitable decarbonisation of the Northern Irish economy will bring. The ready availability of renewable electricity, the North-South Interconnector, investment in renewable transport, receptiveness to new renewable technologies such as storage,

solar and more efficient turbines are all key in this movement towards a decarbonised society.

### ***Turbine Technology and Repowering***

NIRIG urges that consideration be given to re-powering existing generation. Re-powering will be a major issue for windfarms built before c.2000. These windfarms predominantly comprise turbines with a capacity of less than 1MW. The advantages of re-powering are clear: reducing the numbers of turbines, improving efficiency, producing more power and using more cost effective, advanced technology. Neighbours of longstanding wind farms often have a positive view of replacing turbines with fewer more efficient modern ones.

Local Development Plans will be reviewed at 5 and 10 years. Within this timeframe new technologies could be developed: the average turbine tip height consented in recent years is between 110-125m, but applications for 140m tip height are becoming more frequent as design creates larger, more efficient turbines. Germany is developing turbines with a tip height of 200m and recent planning consents in the Republic of Ireland include a 176m tip height consented for a project in Co. Mayo. NIRIG would therefore encourage the DCSDC to consider changes in turbine technology when drafting their LDPs.

### ***Conclusion***

We note that in 2015 two extremely positive and aspirational outcomes were proposed by the DCSDC Energy, Infrastructure and Transport group:

***“By 2030 the Council area will be a region with secure and affordable energy supplied from sustainable sources”***

***“For the North West Region to be a game-changer in the development of a low carbon region by using energy efficiently and by utilising local sustainable energy resources”***

NIRIG believes that this aspirational approach will deliver significant economic, social and environmental benefits for Derry City and Strabane District Council. We believe that the Council has already demonstrated a positive and forward-looking approach to renewables and that this has brought clear benefits to the area. With increased powers now in place at Council level, an opportunity now exists to develop the framework that will allow the Council to build upon these successes. We look forward to supporting these ambitions.

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Meabh Cormacain

**NIRIG**