YOUR COMMENTS

Please provide us with your comments below. Please be as concise as possible and where appropriate provide evidence to support your responses.

KEY ISSUE: ENERGY TARGETS & STRATEGIC PLANNING POLICY

Context: The current policy approach has played an important role in helping to facilitate the achievement of the renewable deployment to date (i.e. 40% of electricity generated from renewable sources by 2020). DfE's Energy Strategy consultation has proposed that a new renewable electricity target of 70% by 2030 should be set. This is within the wider context of consideration of net zero by 2050 and that all electricity in the UK should come from clean sources by 2035. In the context of the climate emergency there is support for increasing renewable and low carbon development to decarbonise our electricity supply. However, it is also recognised that this has to be balanced against any potential unacceptable adverse impacts on the local environment and communities.

Q1. How should future strategic planning policy continue to help NI achieve any new targets for increasing energy from renewable and low carbon sources arising from the emerging Energy Strategy and in doing so assist in addressing the climate emergency?

The council considers that no fundamental change to strategic planning policy is necessary with respect to helping NI achieve the energy targets set out in DfE's Energy Strategy – The Path to Net Zero Energy (December 2021) and addressing the climate emergency. The existing provisions within the SPPS set out a reasonable approach to facilitating Renewable Energy (RE) developments in appropriate locations without compromising environmental assets of acknowledged importance whilst also recognising that there may be wider environmental, economic and social factors to consider.

The council would recommend that any consideration given to revising existing strategic planning policy should take into account SONI's Shaping Our Electricity Future Roadmap (November 2021) and the extent to which existing policy provision would realistically prevent or hinder the assumed renewable generation capacities (Table 19, Pg 66) that are needed to meet the renewable ambition being delivered by 2030 and 2050. Similarly, any significant changes to strategic policy will need to consider the potential implications for SONI's 'blended' approach to future network development – an approach underpinned by the Developer-led approach but also incorporates Generation-, Technology- and Demand-led approaches. This perhaps raises an issue in terms of the need for clear direction from a revised Regional Development Strategy (RDS) that takes account of the likely direction of infrastructure enhancement and associated potential / capacity that may result from the approach SONI is advocating.

Effective strategic planning policy is fundamental to successfully delivering new renewable energy systems, minimising the carbon emissions of what we build, finding the right sustainable locations and designing places that support healthy and zero carbon transport options. As the NI Executive has declared a climate emergency and revised the renewable electricity target upwards to a target of 70% of renewable electricity by 2030, an updated planning policy will enable NI to scale up the existing wind opportunities as well as exploit new opportunities with other renewable energy.

The SPPS already acknowledges the role that Local Development Plans can perform in setting out policies and proposals that support a diverse range of RE development within their council area. It should be recognised, as at December 2021, that 5 of 11 draft Plan Strategies are either with the PAC for the purpose of Independent Examination or as in the case of Belfast is awaiting the release of the PAC report from the

Department. In preparing their Plan Strategy each council will have sought to ensure that their document is sound and will have assessed their Plan with respect to the various tests of soundness which will have included the Consistency Test C3 – 'Did the council take account of policy and guidance issued by the Department?'. Under this test the council will need to be able to show how policy formulation and development has taken account of the SPPS and any other relevant policy and guidance prepared by the Department (para 5.4.10, Development Plan Practice Note 6 – Soundness (DfI, 2017).

The SPSS and forthcoming climate legislation can play a key role in supporting the delivery of carbon reduction targets and those set out in the Energy Strategy. The city climate plan and council climate plan are still under development but will also reflect the key role of a supportive planning framework.

KEY ISSUE: LOCATIONAL CONSIDERATIONS

Context: Strategic planning policy currently provides for a cautious approach in designated landscapes that are of significant value. There have been calls to provide more clarity on where is, and where is not, acceptable for the provision of new and additional development to give certainty to communities, developers, investors and infrastructure providers.

Q2. What are your thoughts on introducing new provisions within strategic planning policy to provide for a more strategic spatial approach for the siting of wind and solar farm (or others types of renewables) development through identifying suitable and/or unsuitable areas in principle?

In general any change to existing policy which has the potential to provide a greater degree of certainty not just for developers and investors, but to communities and infrastructure providers as well would be welcomed. However the council considers that the current 'cautious approach' set out in the SPPS is sufficient in that it clearly states objectives which seek to ensure that environmental, landscape, visual and amenity impacts are adequately addressed and that the region's built, natural and cultural heritage features are adequately protected. Perhaps the missing element is a forward-looking Infrastructure Plan that would provide a spatial dimension to prioritisation in terms of potential locations that would support or utilise existing / planned infrastructure to link generation / storage to consumption. Whilst the current policy approach provides sufficient scope for local councils should they wish to, through their LDP, specify any landscape or environmental designations or other areas that they consider unsuitable in principle for the siting of RE schemes having taken into account local circumstances such as topography, landform and the ability to limit visibility the RDS fails to address the infrastructure aspects in a meaningful way taking account of projected growth and provision.

The Renewable Energy Development policy (ITU 4), Natural Heritage policy (NH1) and Landscape policies (LC1, LC1A-D, LC2, LC3 and LC4) set out in Belfast's draft Plan Strategy are aligned with the SPPS objectives whilst at the same time providing developers with the opportunity to demonstrate that their proposal will not result in an unacceptable detrimental impact to these assets. Importantly this approach allows the council to take account of the wider environmental, economic and social benefits of RE development.

KEY ISSUE: SITING NEW WIND FARMS IN PERPETUITY

Context: In relation to wind farms, the operating period of a wind farm is generally a matter for the developer, subject to relevant planning controls. Consideration could be given to supporting development on sites/areas in perpetuity. Such an approach has the potential to make the best use of land and wind

resource, existing infrastructure, including grid connections. (See also 'Re-powering of existing Wind Farms' below, Question 8).

Q3. What are your thoughts on introducing new provisions within strategic planning policy to require new wind farms to be capable of being sited in perpetuity?

The council would agree in principle with the notion that the siting of wind farms in perpetuity has the potential to make the best use of land and wind resource as well as the existing infrastructure including grid connections. This could provide operators with greater certainty in that, subject to the contemporary planning policy context, the use of the site as a wind farm could continue. However such provision perhaps doesn't take account of issues such as the economic viability of a wind farm operation whereby after twenty or thirty years the operation may no longer be viable. This may give rise to unnecessary complications in terms of the any decommissioning process that may be required. Similarly there is a potential risk that as RE technologies develop and other energy sources come to the fore that holding a site to a specific use in perpetuity may result in the unnecessary and undesirable blighting of land.

Given that an existing approval has established the principle of RE generation on a site this should, subject to the planning policy context, provide sufficient certainty to potential operators that planning permission could be readily secured on an existing site. It is questionable as to the extent to which requiring new wind farms to be capable of being sited in perpetuity would result in the ongoing use of a site for RE generation and also the extent to which this requirement would make a site a more attractive proposition to operators beyond what is provided through current policy provision.

KEY ISSUE: WIND TURBINES & AMENITY CONSIDERATIONS

Context: Strategic planning policy currently provides that any development should not result in an unacceptable adverse impact on residential amenity. Issues that have been a focus of concern regarding the current policy approach include noise, shadow flicker and separation distance of wind turbines. Noise is currently assessed in line with ETSU-R-97 'The Assessment and Rating of Noise from Wind Farms'. BEIS is responsible for the good practice guide to ETSU-R-97 and it is also used in England, Scotland and Wales.

Q4a. How best should strategic planning policy provide for the consideration of such matters when plan-making and decision-taking?

The council considers that the existing provisions within the SPPS together with the guidance provided by DOE's Best Practice Guidance to PPS 18 'Renewable Energy' (August 2009) adequately sets out the residential amenity considerations associated with wind turbines as well as providing details as to how an applicant can seek to mitigate the potentially adverse impacts of a proposal and how these matters should be assessed as part of the determination process. Any change to this approach should focus on maintaining and updating regional guidance to reflect current best practice and relevant considerations for the different aspects of the changing RE developments rather than any significant revision to existing strategic planning policy beyond what has been indicated above. As mentioned previously councils will have the opportunity through their LDP to further elaborate on localised amenity considerations should they consider it appropriate.

Q4b. Do you consider strategic planning policy should require a mandatory separation distance for wind energy. If so, what distance and why?

The council acknowledges that separation or setback distances can be a contentious issue and that an appropriate balance needs to be achieved between protecting residential amenity whilst at the same time not reducing the scope to develop terrestrial wind energy projects that will be needed to meet national targets in terms of electricity generation from renewable sources. SONI's Shaping Our Electricity Future (2021) document indicates that onshore wind generation in Northern Ireland may need to increase by 1,100 MW in order to achieve the target of at least 70% of electricity from renewables by 2030. The council would suggest that this discussion could be better informed if there was evidence demonstrating the potential implications of different setback distances on the potential quantum of development land that may be available for new or expanded generation similar to the exercise undertaken by AIRO for the Republic of Ireland (see Appendix 3, NI Assembly Research Paper: Wind Turbines: Planning and Separation Distances, 2013).

The council would also suggest that any proposed mandatory separation distance specified in strategic planning policy should focus primarily on noise impact and any other relevant public safety or health related considerations. Given that the visual impact of a wind farm may be influenced by specific local circumstances and geography it may be more appropriate for individual councils to consider the need for further separation distance criteria within their LDP with the SPPS referring to this as an appropriate approach / consideration. Policy ITU4 of Belfast's draft Plan Strategy adopts the same specification as set out in paragraph 6.227 of the SPPS i.e. "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." This approach should provide some flexibility to allow for local circumstances to be taken into account along with other relevant planning considerations.

KEY ISSUE: DECOMMISSIONING AND SITE RESTORATION FOR NEW DEVELOPMENT

Context: In relation to developments such as wind farms and solar farms strategic planning policy currently requires applicants to provide details on future decommissioning, including proposals for site restoration e.g. timescales, financial bonds etc. In such cases planning conditions, or a legal agreement where appropriate, should be used. The review will consider the appropriateness of this approach for future wind turbine and solar farm development.

Q5. What are your thoughts on the best approach to decommissioning and restoration of future wind turbine and solar farm development?

The council is not aware of any evidence or reasoning as to why the current approach to the decommissioning and restoration of RE developments needs to be revised. A Decommissioning and Restoration Plan (DRP) should specifically state what it is seeking to achieve and provide an appropriate level of detail as to how the infrastructure will be removed and the site restored. This should allow for effective compliance monitoring to be undertaken by the relevant authority. Best practice (Scottish Natural Heritage, 2016) would seem to indicate that a DRP should be reviewed at least every 3-5 years throughout the lifetime of the development in order to ensure that site conditions, maintenance requirements and unexpected events do not compromise the objectives of the DRP. In the 3-5 years prior to the year of decommissioning, the DRP should be revised, if required, and completed to provide full details of decommissioning and submitted to the relevant Planning Authority. Whilst It is acknowledged that this approach may place an additional burden both on the operator/developer as well as the local authority it would seem to be a

reasonable approach given the sustainability aspirations set out in regional and strategic policy. Although there doesn't appear to be any compelling reason as to why the decommissioning and site restoration process cannot be achieved through the use of planning conditions the council acknowledges that a legal agreement may be more appropriate given that it goes with the land and thereby is more binding than a planning condition.

KEY ISSUE: SOLAR FARMS AND AGRICULTURAL LAND

Context: There have been concerns that agricultural land has been lost to solar farms, whilst more sustainable alternative sites may exist, such as previously developed lands.

Q6. Do you consider strategic planning policy should prioritise non-agricultural land for renewable energy development, such as solar energy. If so, how and why?

The council appreciates that the loss of agricultural land may be an undesirable consequence associated with large scale RE developments such as solar farms and as such would support a policy approach that would encourage, where practicable, the prioritisation of the use non-agricultural land over the agricultural equivalent. However it is often the case that the use of agricultural land for solar farms is a temporary use whereby the potential for agricultural use isn't lost in perpetuity. This scenario further reinforces the need to continue to apply current approaches to decommissioning as mentioned in the response to Q5.

The loss of agricultural land will only be one of a range of material considerations that is taken into account when determining an RE application and inevitably a balanced view will need to be taken and is a matter that should be addressed in the strategic consideration of the emerging Green Growth Strategy with links to other strategic policies or existing initiatives such as "Going for Growth". This is a strategic consideration under which any protection or precautionary approach proposed in relation to agricultural land assets would, to be sustainable / equitable, have to be applied equally to other forms of proposed development that could result in such losses or erosion of the assets. This would require an effective definition of what quality of agricultural land it would be applied to and the delineation and monitoring of the overall supply by DAERA.

KEY ISSUE: CO-LOCATING RENEWABLE, LOW CARBON AND SUPPORTING INFRASTRUCTURE

Context: There are considered to be a range of potential economic and environmental benefits associated with co-locating renewable, low carbon energy and storage infrastructure together, where appropriate. Such an approach may help exploit the advantages of grouping development in order to maximise energy generation and capture whilst making best use of land and infrastructure. For example, co-locating different technologies such as solar and/or wind farms with battery energy storage systems/facilities.

Q7. Should strategic planning policy provide for the appropriate co-location of renewable, low carbon energy and supporting infrastructure? If so, how best might this be achieved and why?

The council would agree with the notion that, where appropriate, there could be potential economic and environmental benefits associated with co-locating renewable, low carbon energy and storage infrastructure together - as referred to above. However, taking the example of co-locating a solar or wind farm with a battery energy storage facility it may, from the developer/operator perspective ultimately come down to the economic viability of this approach and the implications in terms of the infrastructure access during

generation and utilisation. Whilst it may be something that strategic planning policy could encourage on the basis of best usage of land and infrastructure networks the council considers that existing policy provision is sufficiently flexible in that it does not preclude co-location, and that irrespective of whether or not co-locating is an element of a RE application it will need to be demonstrated that the proposal will not result in an unacceptable impact on the planning considerations identified in paragraph 6.224 of the SPPS and Policy ITU 4 of Belfast's draft Plan Strategy.

KEY ISSUE: RE-POWERING EXISTING WIND FARMS

Context: There are potential benefits with supporting the repowering of existing wind farm sites which are already in suitable locations. Whilst planning applications would still be required to consider the details of any proposed future new development, the established use of an area of land could be considered in principle to be acceptable for that particular use indefinitely, i.e. in perpetuity.

Q8. Should strategic planning policy provide for and/or encourage the re-powering of wind turbines as they come to the end of their consented lifespan and require/allow that all new wind farms should be sited in perpetuity?

See response to Q3.

KEY ISSUE: EMERGING TECHNOLOGIES AND OTHERS

Context: A challenge for strategic planning policy is to ensure that the planning system can appropriately provide for consideration of the relevant planning matters associated with all renewable and low carbon energy development and supporting infrastructure, including emerging technologies, such as battery energy storage systems, hydrogen energy, geothermal energy/power development etc.

Q9a. What do you consider to be the emerging technologies and how best should strategic planning policy provide for their consideration by relevant planning authorities when plan-making and decision-taking?

The Resilience Assessment element of the council's Resilience Strategy (December 2020) acknowledges that Belfast is a net importer of energy and that the city's dependence on energy will increase in the coming years at least in part due to the electrification of heat and transport. Energy demand and energy security represent a major challenge to Belfast, a challenge which makes the transition to low carbon sources of energy an even greater priority for the city.

The so-called 'energy trilemma' is a well-known phenomenon within cities. It relates to balancing security of energy supply for sustainable economic growth with a supply of affordable energy so all households can live in healthy warm environments with environmentally sound sources of energy in response to a changing climate.

Given this scenario the council seeks to support RE generating schemes, whether based on established or emerging technologies, providing the proposal will not result in an unacceptable impact on the planning considerations cited in paragraph 6.224 of the SPPS and Policy ITU 4 of Belfast's draft Plan Strategy i.e. :

- public safety, human health, or residential amenity;
- visual amenity and landscape character;
- biodiversity, nature conservation or built heritage interests;

- local natural resources, such as air quality, water quality or quantity; and,
- public access to the countryside

Furthermore, given that the Plan Strategy is to be read 'in the round' all criteria used in each PS policy that apply to a proposal will need to be considered.

As such the council considers that existing strategic planning policy adequately provides for the consideration of emerging RE technologies in relation to plan-making and decision-taking. The electrification of the power, heat and transport systems are key elements of the new NI Energy Strategy. This inevitably means that the demand for renewable electricity will grow significantly and that energy generation will become more decentralised. Whilst most renewable energy in NI will continue to come from onshore and off-shore wind, there is also opportunity to scale up large scale solar and PV arrays with battery technology both on land and as elements of build development proposals.

Supportive planning policy can be one element of initiative to encourage this type of microgeneration which will contribute to the objective of net zero carbon buildings in cities by balancing the demand for energy with the intermittency of supply. Recent engagement with developers has indicated their willingness to invest in this technology, to encourage net zero carbon buildings powered by place-based renewable generation. An ambition that supportive planning policy should encourage as part of a broader drive for longer term sustainability.

Q9b. How best should strategic planning policy provide for the consideration of battery energy storage systems by relevant planning authorities when plan-making and decision-taking?

In terms of strategic planning policy the council considers that it would be sufficient to acknowledge that battery energy storage systems (BESS) as one of a number of emerging storage or capture technologies will have a role in meeting renewable energy targets towards the overall ambition of net zero by 2050. SONI's Shaping Our Electricity Future (2021) document indicates that Battery Energy Storage (BES) will be required as part of the need for reserve provision, capacity adequacy and to assist with congestion management and anticipates that Northern Ireland will have an assumed BES capacity of 300 MW by 2030 (Table 21, Pg 71).

Whilst there are potential benefits from co-locating BESS with large scale RE schemes there is no apparent need to make this a prerequisite. The provisions of paragraph 6.224 provide sufficient coverage when considering an RE scheme which incorporates BES (i.e. as 'any associated buildings and infrastructure'). The same planning considerations should still apply when a BES scheme comes forward in isolation together with input from relevant consultees. It may be that the wording needs to be less specific to include other forms of storage or conversion technologies that may emerge as suggested by initiatives such as the UK Hydrogen Strategy (BEIS, 2021).

Q9c. What do you consider to be any other issues relevant to renewable and low carbon energy development and how best should strategic planning policy provide for their consideration by relevant planning authorities when plan-making and decision-taking?

The strategic approach to policy in other jurisdictions has sought to facilitate the storage of renewable energy from solar and wind farms. The outcomes from this should be kept under review and inform the position within Northern Ireland to help ensure planning policy does not present barriers for energy storage projects or discourage bolder investment decisions in the storage facilities highlighted as an important element of the overall energy strategy.

The council has nothing specific to add with respect to this question that hasn't already been addressed in our responses to the previous questions other than the need to consider how emerging technologies are addressed (see above) and the principles that need to be considered for all developments in relation to their impacts, integration and longevity / adaptability (potential decommissioning and restoration).