



Northern Ireland
Chamber of Commerce
and Industry

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Revised Regional Strategic Planning Policy: Renewable and Low Carbon Energy Consultation

Response from NI Chamber

June 2023

About NI Chamber

With 1,000 members, representing over 105,000 employees, Northern Ireland Chamber of Commerce and Industry (NI Chamber), has supported the development of the economy for almost 240 years and is 100% funded by the private sector. We work across all of Northern Ireland, helping SMEs to grow and export and larger firms to thrive.

Our membership spans businesses across key sectors including manufacturing, construction, professional services and a broad range of wider services. NI Chamber consults with these members on a regular basis, around all issues/concerns that they face in doing business locally, nationally and internationally.

Our Response

NI Chamber welcomes the opportunity to respond to the Department for Infrastructure's (DFI) consultation on the Review of Regional Strategic Planning Policy on Renewable and Low Carbon Energy.

With significant ambitious statutory targets set out in the Climate Change Act for 2030 and beyond, it is imperative that the Regional Strategic Planning Policy on Renewable and Low Carbon Energy facilitates rather than impedes the opportunities that are presented for renewable generation, in what is a competitive international market.

To that end, we would wish to re-iterate and endorse the views expressed by sector lead, Renewable NI and other stakeholders in our submission.

We would wish to highlight the following issues of concern for further consideration and discussion:

1. Set back distance.

It is our understanding following consultation with the sector that the adoption of a x10 rotor diameter separation distance is overly restrictive and risks undermining future on-shore wind development. It therefore seems inevitable that this obligation will only become more restrictive as larger, more efficient turbines become available and smaller turbines are phased out of production.

We would therefore submit that the x10 rotor diameter guidance should be removed with noise and shadow flicker impacts assessed on a case-by-case basis, and conditioned where necessary based on the relevant circumstances and objective evidence.

2. Unclear weighting for renewables.

It is noted that the change from PPS 18 RE1 which provides for "significant weight" to the wider benefits of renewable projects to guidance in the draft revised policy to "take full account" of NI's climate targets in planning decisions.

It is vital that "significant weight" is given to the benefits of renewable energy projects in order to accelerate the deployment of new projects and deliver the 2.5GW of renewable energy needed by 2030.

3. Solar farms and previously developed land.

Solar development will need to be scaled up to meet our climate goals, and new solar farms will likely require 150+ acres each.

There are unlikely to be sufficient non-agricultural sites of this scale available in NI and a policy restricting solar development to previously developed areas will prevent the scaling up of solar farms needed by 2030.

It is therefore not appropriate that priority is given in the revised policy to previously developed land for solar farm use.

4. Spatial planning approach.

Given the late stage of LDP development and fast approaching 2030 targets, we are concerned the provisions for a spatial approach through LDPs will not be feasible in the current timeframe, nor a desirable approach to identifying suitable areas for development. We also note the approach of councils to date has been to identify areas not suitable for renewable development, which is the opposite of the proposed approach in the revised policy.

The Department for Infrastructure will not have the significant expertise, time, or resources that would be required to implement this approach and identify suitable locations for development. There is also a risk that identified sites would not be commercially attractive or may not have access to affordable grid connections.

Each site should be assessed on its own merit and factors such as environmental impact and community views are more appropriately assessed within the current planning system.

5. Further Reforms

NI Chamber notes that the draft revised policy is part of a wider review of the NI planning system and legislative changes or changes to planning guidance are not within scope of this consultation.

It therefore excludes many actions which are needed to address planning timelines including the resourcing of statutory consultees, late objections, and a lack of accountability for meeting statutory targets.

Existing planning timelines are a significant barrier to the deployment of new renewable projects in NI, as applications over 1 MW typically face an approval timeframe of 160 weeks.

Given the urgency of the climate crisis and fast approaching 2030 target, we encourage DFI to take urgent action to address this.

Whilst NI Chamber appreciates and understands the constraints imposed on the Department as a result of both budgetary challenges and the absence of Executive Ministers, as a constituent member of the Interim Regional Planning Commission, it is our view that the work of the Commission must be accelerated with a report produced at the end of the calendar year to outline its recommendations for reform.

While we are encouraged by the consideration shown for renewable and low carbon energy development, we are concerned the impact of the revised policy as currently drafted would be to restrict current and future renewables development across NI.

It must also be noted, but again is in issue outside of scope, that associated transmission and distribution infrastructure will need to be in place to support the necessary increase in renewable generation, including the required grid infrastructure.

We would like to thank the Department for the opportunity to engage on this matter and look forward to continuing our work with you in future.

ENDS

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