Wind Energy Development in Northern Ireland's Landscapes

Draft Supplementary Guidance to Accompany Planning Policy Statement 18 'Renewable Energy'

Comments by

Northern Ireland Environment Link

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Northern Ireland Environment Link is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 50 Full Members represent over 90,000 individuals, 255 subsidiary groups, have an annual turnover of £44 million and manage over 230,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments we would be delighted to do so.

Prof Sue Christie, Director
Northern Ireland Environment Link
89 Loopland Drive
Belfast, BT6 9DW
P: 028 9045 5770
E: Sue@nienvironmentlink.org
W: www.nienvironmentlink.org
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Introduction

Northern Ireland Environment Link (NIEL) welcomes the publication of the draft Supplementary Guidance to the Planning Policy Statement on Renewable Energy (PPS 18). We welcome this consultation but in particular the stakeholder group meetings that accompanied the policy drafting process. Such involvement by stakeholders at an early stage helps to ensure the resulting policy meets many major concerns and ensures an improved policy outcome.

Renewable energy will play a vital part in reducing Northern Ireland's carbon footprint, but only if supported by appropriate planning, fiscal and environmental policies. Northern Ireland currently generates only 4% of its electricity from renewable sources. The current renewable electricity market in Northern Ireland is dominated by wind. This is unsurprising as the technology is proven and competitive, and the wind resource is abundant..

The Northern Ireland Sustainable Development Strategy (NISDS) sets the target that, "beyond 2025 40% of all electricity consumed in Northern Ireland is obtained from indigenous renewable energy sources with at least 25% of this being generated by non-wind technologies." It can be assumed that the further development of terrestrial wind farms will play a significant role in reaching our renewable targets but energy from offshore wind farms, tidal, wave, solar, biomass, hydro and geothermal will also be essential. In facilitating further wind development, due regard must be given to facilitating and promoting further diversification of the renewable energy resource.

Although PPS18 does not apply to off-shore development proposals, an integrated, comprehensive approach to planning for all renewables is required. NIEL would emphasise that any planning system for renewable energy sources must be applied not just to the terrestrial environment but also to the marine environment. Marine Spatial Planning (MSP) is a key element of the Marine Bill and it is essential that all government departments with responsibilities for the marine environment account for the role that MSP is likely to play in the management of any/all marine related plans and developments. The visual impact (from land and at sea) of offshore wind farm developments must also be considered in the approval process, therefore we support the rationale for commenting on two potential coastal wind farm sites.

Northern Ireland Environment Link supports the overall aim of PPS 18 to encourage and facilitate the provision and siting of renewable energy generating facilities in appropriate locations within the built and natural environment and the main objectives behind it. However, the imperative for utilising renewable energy must not be used to justify bad schemes in the wrong area. While every scheme should be considered on its merit, the overarching policy aim should be central in the decision making process.

Guidance for Wind Energy Projects

It is appropriate that special consideration is given to wind energy developments as wind will remain the most important renewable energy for Northern Ireland for some time to come. The overall impact of wind farm developments must be carefully assessed. The impact of a proposed wind farm on nature conservation and important habitats (including designated sites, but also areas of ancient woodland and semi-natural sites) should be particularly closely considered.

The following text was recommended for paragraphs 4.4 - 4.7 in the NIEL response to the draft PPS18 response:

> *Renewable energy developments likely to have a significant effect on a Site of International Nature Conservation Importance or a World Heritage Site will be subject to an appropriate assessment. Planning permission will only be granted where the Department ascertains from the assessment that the proposed development would not adversely affect the integrity of the designated site.*
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> *Where the assessment shows the renewable energy development would have an adverse effect on the integrity of a Site of International Nature Conservation Importance, or it cannot be shown otherwise, planning permission will only be granted where there is no alternative solution and there are imperative reasons of overriding public interest, including those of a social or economic nature.*
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> *In addition, where a site hosts a priority habitat or species and there are no alternative solutions, development will not be permitted unless it is necessary for reasons of human health, public safety, or a beneficial consequence of primary importance to the environment, or for other reasons which in the opinion of the Department, having considered the opinion of the European Commission, are imperative reasons of overriding public interest.*
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> *Where planning permission is permitted for developments with an adverse effect on the integrity of a Site of International Nature Conservation Importance, or where the appropriate assessment cannot prove otherwise, appropriate compensatory measures will be required. This is to ensure that the overall coherence of the network of international sites is protected. Ideally, this will require the new habitats to be fully ecologically functional before the predicted adverse effects occur.*

The landscape impacts are also important and developers should mitigate the visual impact as much as they can. Therefore, we welcome the preparation of supplementary guidance detailing the specific sensitivity to wind energy development of Northern Ireland's 130 Landscape Character Areas. The approach and methodology seem appropriate and relatively robust but it must be noted that each assessment contains a significant element of subjectivity: consequently, the inclusion of such prescriptive capacity ranges (especially recommending small turbine heights which may not be efficient or economic and may actually necessitate more turbines) is not appropriate.

We note that only 2 out of the 130 Landscape Character Areas (LCAs) were classed as having medium to low sensitivity for commercial wind farm development. We are concerned that this assessment could potentially be used as an argument against wind farm development across almost all of Northern Ireland, which would be undesirable and unhelpful. Therefore, we must emphasise that extreme care should be taken to ensure that visual amenity loss is not used as a stock and trade reason for denying permissions to necessary and appropriate developments.

Northern Ireland Environment Link believes that section 4 *Guidance on Preparing Wind Energy Proposals* is a very useful and relevant resource for developers and the discipline of consulting the sensitivity and capacity assessment sheets can focus the developer on the sites that are most suitable, and thus the most likely to obtain consent. We particularly welcome that the principal conservation sites and features that need to be considered in each LCA are identified in the landscape sensitivity and capacity assessment sheets.

The supplementary guidance notes that:

> *It is important to note that the landscape sensitivity and capacity assessment is intended to provide broad, strategic guidance on appropriate locations for wind energy development. However, every development proposal is unique, and there remains a need for detailed consideration of the landscape and visual impacts of individual applications on a case by case basis, as well as for consideration of other issues referred to in Planning Policy RE1.*

It is also noted that an EIA will, in most instances, be required and that a landscape and visual impact assessment (LVIA) of good standard will be required. This exercise will include the consideration of alternatives and the explanation of why the preferred solution represents the optimum landscape fit. These measures should facilitate better project proposals and thus improved outcomes.

As well as offering developers direction, the supplementary guidance will also be used by the Department in determining planning applications for wind energy development, to inform judgements on the impacts and acceptability of proposed developments in landscapes and visual terms. The Department must clearly explain the role the Supplementary Planning Guidance will play in their decision making process. In order to obtain permission must the proposed development fall within the capacity range stated in the sensitivity and capacity assessment sheets for that LCA? Section 4.6, and in particular Table 11, do not provide the clarity required.

We support the statements that:

> 'The wider environmental, economic and social benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that will be given significant weight in determining whether planning permission should be granted.'

NIEL believes that, while the interpretation of sensitivity as stated in this guidance should be an important factor in the decision making process, final decisions should be made based on the full range of environmental and technical considerations.