

# ***Consultation on an Offshore Renewable Energy Strategic Action Plan 2009 - 2020***

***Comments by***

**Northern Ireland Environment Link**

**8 March 2010**

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

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

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## Introduction

We welcome the consultation process and commend the effort to involve stakeholders in the proactive development of policy work to ensure the many benefits that involvement of and input from stakeholders can achieve. The process takes time, but when done in a true spirit of collaboration saves time in the long term by identifying and addressing concerns of citizens, non-governmental organisations and other government departments and agencies at an early stage.

We strongly welcome the commitment of the Department to obtain 40% of NI electricity from renewable sources by 2020. This is fundamental to driving action on climate change and energy security, both of which are vital for Northern Ireland's long term sustainability. Setting ambitious targets and ensuring that the government legislative and physical infrastructure are in place to facilitate their delivery is vital if Northern Ireland is to meet its share of the 80% reduction in Greenhouse Gas emissions by 2050 required to avoid catastrophic climate change.

We also strongly support the need for a Strategic Environmental Assessment to ensure that this goal is met with minimal environmental damage and in the best possible way for the future energy and environmental needs of Northern Ireland. The extensive development of renewable resources required to meet the above commitments must be undertaken in a fashion designed to cause the least possible environmental damage and a comprehensive SEA backed up by specific Environmental Impact Assessments for each specific site is the best way to achieve this.

Northern Ireland Environment Link publishes its Policy Priorities annually in our document titled The Way Ahead. This consultation relates to all four of the main themes within that report; climate change, sustainable development, planning and environmental protection.

## General Comments

In its response to the Scoping Report for the SEA the Northern Ireland Marine Task Force raised the following issues which should be addressed through this SEA and we support and reiterate these points:

1. The Strategic Action Plan (SAP) should adopt a spatial approach to delivering wind, wave and tidal power.
2. The NI Offshore SEA has a critical role to play in supporting the faster delivery of Northern Ireland's Marine Protected Area (MPA) network and future marine spatial plans.
3. Existing data gaps highlight the need for an offshore survey programme and a comprehensive offshore database.
4. A key part of the SEA must focus on identifying alternatives within the plan, and therefore the least environmentally damaging plan for marine renewable power generation in NI.

The SEA scoping report does not describe the alternatives that will be assessed in the next phase. We recommend that this SEA consider and assess:

- i. alternative targets for offshore wind, wave and tidal power;
  - ii. alternatives for spatial distribution of marine renewables, and;
  - iii. alternative environmental criteria within the Strategic Action Plan (Section 1.4 states that the SAP will establish environmental criteria against which individual developments will be assessed in determining a development application).
5. The SEA should adopt a precautionary approach to assessing cumulative effects.

6. The SEA should identify whether buffer zones in some sensitive areas may be required advising the adoption of the precautionary principle with regard to the spacing and distance of buffer zones.
7. The SEA should fundamentally assess potential transboundary effects.
8. Appropriate Assessment of the SAP and future licensing/leasing proposals should be undertaken.
9. Effective cross-linkages need to be made between the upcoming NI Grid SEA and the Marine Renewables SEA.

The speed of development of the technology which will be available to deliver on the renewable energy targets compounds the difficulties of delivering them. This speed of change coupled with the often long time periods required for assessments and planning permission could lead to significant problems in the long term efficiency, cost effectiveness and sustainability of any proposed development.

The lack of a Marine Bill in Northern Ireland and a coherent system of marine spatial planning and Marine Protected Areas (and the underlying research required to deliver these) is a serious concern. Without this knowledge and supporting structures it will be very difficult to ensure that the rapid development of marine renewables takes place in the best places and to ensure the protection of the marine environment and vital marine resources.

The need for major change and upgrading of the electricity grid system to accommodate large scale input from renewable sources presents a financial and logistical challenge which it is vital to address in conjunction with the development of the offshore resources.

### **Sustainable Development**

In the consultation document it refers *to meet the needs of present without comprising the ability of future generations to meet their needs* with regard to sustainability. This must be implemented not just in terms of energy resources but also in terms of biodiversity and long-term protection. In the SEA proposals there are areas listed that are of prime importance as marine nature conservation sites and in the absence of an ecologically coherent Marine Protected Area network we would eliminate these areas from having commercial renewables within them without thorough scientific investigation.

### **Responses to Consultation Questions**

#### **Chapter 2.**

1. Marine renewables have a major role to play in meeting our GHG and carbon reduction targets. Current estimates seem to put payback periods for both carbon and money at one to two years. It is important to ensure that any technology is fully costed for its lifetime carbon as well as financial costs and that these figures are a major aspect of promotion of schemes to ensure public support. We are particularly concerned with how and where grid connections to schemes in the proposed zones might make landfall. We request further information on this be included in the final version of the SAP, and look forward to engaging with the proposed Grid SEA.

<http://www.carbontrust.co.uk/SiteCollectionDocuments/Various/Emerging%20technologies/Technology%20Directory/Marine/Other%20topics/Life-cycle%20energy%20and%20emissions%20of%20devices%20.pdf>;  
<http://www.see.ed.ac.uk/~gph/carbon/>;  
<http://journals.pepublishing.com/content/830126865123p760/?p=23a66932b90a44cf97cd9bf43bd32ce7&pi=4>; <http://www.parliament.uk/documents/upload/postpn268.pdf>)

It is very important that the SEA identifies both renewable energy opportunity areas and ensures that the areas chosen for energy reasons are fully assessed to ensure that their exploitation for energy will not cause unacceptable levels of environmental damage to unique sites. There should be a presumption against energy development for sites of high nature conservation value unless it can be proven that there will be no significant effect although the precautionary principle should be adopted in the absence of data, especially in advance of the completion of ecologically coherent networks of Marine Protected Areas. Energy and economic criteria must be considered in the context of environmental protection when determining whether large areas are being designated for potential development. The development of storage capacity to overcome issues of intermittency of generation is very important. Incentives may need to be provided to encourage full take up of the capacity in a very short timescale. There needs to be harmonisation between Northern Ireland, the rest of the UK and the Republic of Ireland in terms of exploitation of the resource and development of the infrastructure required to fully utilise renewables. Incentivisation schemes also need to be harmonised and designed to stimulate appropriate technology and infrastructural development.

Integration of all aspects of any development should take place through a single Environmental Impact Assessment for any proposal. The importance of sharing information across projects should be emphasised and ensured through the monitoring Forum. The proposed Deploy and Monitor approach is useful and will provide much information, but the cumulative impacts of size must not be ignored and it is vital that initial decisions are taken on the basis of full assessments of potential environmental impacts. We would also point out the need for a Marine Management Organisation (MMO) for Northern Ireland to manage and be a centre for data exchange and expertise . as well as providing independent advice on proposals for renewables. A recent report from the Northern Ireland Marine Task Force showed an MMO, with enhanced delivery options, could be run for around £6.1million per year - £1million cheaper per year than existing marine governance arrangements.

### **Chapter 3**

We support the assessment in general and particularly welcome the proposal to have an Advisory Forum which should consider the development of the Plan. Given the urgency of the need to develop the resource we concur with the targets, but would have some concern about the practicalities of delivering them in the timescale due to the potential for planning delays, environmental surveys and technological development and delivery.

In terms of paragraph 12, chapter 3, it is not just the consideration of the effects on the Giants Causeway World Heritage Site and Causeway Coast AONB that will influence the location and amount of renewables, it is also sites such as Rathlin SAC, and potential SACs on the North coast such as the Skerries for example that will need to be considered. We would also like to see advice administered prior to the leasing of sites of what other sites will need to be protected to constitute fulfilling the ecologically coherent Marine Protected Area network according to OSPAR requirements and IUCN guidance. We support paragraph 13 stating that sites such as the Maidens, Copelands and Strangford Lough should not be considered suitable for commercial scale developments as these sites are of high nature conservation interest, two of which may become future Natura 2000 sites.

As there are real shortages in benthic ecology data we would advise the use of historical data from earlier surveys such as the Inshore Marine Life of Northern Ireland Surveysq and any data that can be found from earlier records. This will also help to avoid shifting

baselines in terms of the marine data not representing the dramatic changes that have occurred in many areas of the marine environment. We would also reiterate the adoption of the precautionary principle for data interpretation. These considerations should also aid in the delivery of the 2010 halting biodiversity loss target under the Convention on Biological Diversity.

Regarding paragraph 17 this repeats the need for a Northern Ireland Marine Management Organisation, please see above.

We have concerns regarding the deploy and monitor approach as caution must be taken in the deploying of technologies where there is a lack of data. Again the precautionary principle must be utilised and where there is any doubt of significant detrimental effects occurring in the marine environment other options should be considered.

#### **Chapter 4**

The proposed target is probably as high as is likely to be achievable in the timeframe, but it is arguable that it is not sufficiently high to reach the ultimate target of 80% reduction by 2050. Therefore while this is an acceptable intermediate target, planning should begin now for a much greater use of renewable resources and the development of the infrastructure (grid, storage, new technology, etc.) required to deliver 100% of our electricity from renewable sources by 2030 at the latest.

It is essential that there be full public and political support for the targets to be met and therefore there must be supportive work in this area as well as physical infrastructure and development. The problem of lack of public support delaying planning is significant and must be avoided by proactive, coordinated approaches to help people and politicians recognise the benefits of the development, the immense consequences and costs of not developing the infrastructure, and ensuring that the people feel involved in the process and trust it through the strong presence of the proposed Forum. Strong political support is also essential.

#### **Chapter 5**

Reporting, monitoring and evaluation procedures could and should be made more robust i.e. with a clearer line of accountability for performance. Close monitoring is essential if the challenging targets are to be met, and shortfalls in action must be addressed urgently. The role of a Marine Management Organisation (hopefully to be part of the structures introduced in a Marine Bill which should be in place by 2012) should be clarified with regard to this monitoring. Monitoring should include environmental impacts as well as progress against targets.

Sites for renewables may also be used as highly protected sites that would serve as excellent exclusion zones for scientific monitoring and study. The Universities in Northern Ireland may well be keen on being involved with research and monitoring projects that would arise through initiatives such as this.