

This item is deemed to be restricted by virtue of Paragraph 3 of Part 1 of Schedule 6 of the Local Government Act (Northern Ireland) 2014 - Information relating to the financial or business affairs of any particular person (Including the Council holding that information)and the public may by resolution be excluded during this item of business.

Appendix 2

Revised Regional Strategic Planning Policy – Renewable and Low Carbon Energy

Public Consultation Document

Response of Newry, Mourne and Down District Council

Consultation Questions

Q1: Do you agree, that overall, the revised policy will help to ensure that the planning system can play its part in supporting wider efforts of government in addressing climate change and decarbonising the energy sector? If not, please explain how the draft policy can be improved.

Yes, it is considered the revised policy will help to ensure that the planning system can continue to play its part in supporting wider efforts of government in addressing climate change and decarbonising the energy sector. In doing so it is important that there continues to be a balance between facilitating renewable and low carbon energy development and other important interests of acknowledged importance, such as the assessment of potential environmental and amenity impacts of development and the protection of important habitats and landscapes.

Q2: Do you agree that the new provisions for a spatial approach through LDPs will assist in providing certainty and clarity to planning authorities, communities and developers alike by providing a presumption in favour of development in areas identified in LDPs? If not, please explain how the draft policy can be improved.

Yes, generally speaking. However, this will be dependent on the geography, topography and landscape qualities of each District. Para 1.9 states that *“having undertaken an assessment of their area’s full potential, councils must bring forward spatial policies in their LDP which identify the most appropriate areas for renewable energy development, including wind farms”*. However, this does not take into account that for some Districts the results of such an assessment may highlight that there are limited or no appropriate areas.

Indeed the ‘must’ bring forward spatial policies which identify areas for renewable energy development of para 1.9 is contradicted by para 1.11 which recognises that there are landscapes across Northern Ireland where their intrinsic value should be protected against inappropriate renewable and low carbon energy development, and states that a cautious approach for renewable and low carbon energy proposals will apply within designated landscapes which are of significant value, such as AONBs. It goes on to state that visually dominant development proposals should be avoided in such sensitive landscapes as it may be difficult to accommodate developments and their associated infrastructure, without detriment to the region’s cultural and natural heritage assets.

This issue is of particular concern to Newry, Mourne and Down which is home to many of the region’s most important and significant cultural and natural heritage assets. Of the eight AONBs in Northern Ireland, three are in the District (Strangford and Lecale, the Mournes, and Ring of Gullion). The three AONBs cover 56% of the District area. Many other areas of the District are covered by other national and international environmental designations for the protection of landscapes and natural habitats. In addition to these environmental

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designations, it should be noted that the whole of the District is now designated as a UNESCO global geopark.

The Mourne Gullion Strangford Global Geopark was approved by UNESCO in December 2022 and ratified by Unesco's executive board on 24th May 2023.. A geopark is a single unified geographical area, where landscapes of geological significance are managed holistically for the protection of its geology, the education of its people and visitors, and the sustainable development of its businesses. The Unesco global geopark designation recognises the area's internationally significant geological heritage, particularly the spectacular landscape of the District's three AONBs, the dramatic ancient volcanic landscapes of the Ring of Gullion, the high granite peaks of the Mourne and the rolling drumlins of Strangford. The geopark boundary covers not just the whole of District's land area but also extends into the adjoining Carlingford, Murlough and Strangford Marine Protection Areas. The designation is an international standard, and a Geopark enjoys the same level of recognition as UNESCO World Heritage Sites.

The significance of the landscape of Newry, Mourne and Down and its economic value in terms of tourism is not just important for the District but for the wider region, the need to protect it from unacceptable and inappropriate development is of utmost importance, particularly in terms of visual impact and geological risk mitigation. This includes many renewable and low carbon energy development proposals, which by their nature and scale are often landscape intrusive, not just in respect of the renewable energy development itself (e.g. wind farms, solar farms) but also all the supporting and connecting infrastructure associated with (e.g. electrical generation, transmission, and distribution systems, including transformer stations and overhead powerlines). The cumulative impact of such development is of particular concern within designated and sensitive landscapes such as AONBs, which is often seen as having a negative visual impact on the environmental quality and amenity of those areas. Considering how best to support renewable energy development whilst protecting the District's locally and regionally important landscapes is a key challenge for the LDP.

The revised policy must take the above concerns fully into consideration. It is considered that the requirement that the councils 'must' identify areas is too strong and should revert back to the 'should' approach when it comes to setting out policies and proposals in LDPs as set out under current SPPS policy for renewable energy (SPPS paragraph 6.221).

Q3: Do you agree with the draft revised policy approach to provide a presumption in favour of re-powering, extending and expanding solar and wind farm developments, where appropriate? If not, please explain how the draft policy can be improved.

Yes, with emphasis on 'where appropriate'. While providing a presumption in favour, proposals will still need to be carefully considered to ensure that any potential adverse impacts related to the development are still compatible to the location in which it is proposed, particularly where there have been any material changes applicable to the location since the original development was approved (e.g. other new development in proximity, any new or amended environmental designations, changes to other applicable policy and/or legislation).

Q4: Do you consider that the draft revised policy provides an appropriate regional strategic planning policy framework for plan-making and decision-taking for all forms of renewable

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and low carbon energy development? If not, please explain how the draft policy can be improved.

Yes and No. Yes, in terms of the forms of renewable and low carbon energy development that are currently to the fore, and in reference to emerging technologies (e.g. green hydrogen, battery energy storage systems). However, in respect of the latter, there is a need to ensure that the revised policy is suitably future proofed to account for other emerging and new technology in the advancement of renewable and low carbon energy development.

Again, there is concern with the wording of Para 1.24 which states that "Planning authorities must support emerging technologies". The requirement that Councils, as planning authorities, 'must' support emerging technologies is too strong and does not respect the wider role of the Councils in representing and working in the best interests of its people and communities, particularly where such emerging technologies may prove controversial as has recently been experienced by some Councils with opposition to proposed developments for battery energy storage systems.