



Review of Strategic Planning Policy on Renewable and Low Carbon Energy - Issues Paper

RTPI NI Response to the NI Department for Infrastructure

.....

February 2022

The Department for Infrastructure is consulting on the following issues paper:
[Review of Strategic Planning Policy on Renewable and Low Carbon Energy - Issues Paper | Department for Infrastructure \(infrastructure-ni.gov.uk\)](#)

The RTPI Invest and Prosper research demonstrates the positive contribution that planning makes across the UK. In relation to energy and climate change “the planning system can prevent locking-in inefficient, high-carbon infrastructure that will be used for decades. Through stringent climate requirements, the planning system has the potential to avoid significant carbon lock-ins from fossil-fuelled infrastructure that make it difficult to shift to lower-carbon pathways. This could include requirements for on-site carbon reductions and utilising renewable energy generation.”

https://www.rtpi.org.uk/media/6721/investandprosper_oct2020.pdf

Energy targets & strategic planning policy

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?

A well-resourced, plan-led, positive planning service offers an established and effective process to support a sustainable future for NI. However, the service is under particular pressure and scrutiny, with specialist resources under particular strain. The adequate resourcing of the planning system is a key factor in delivery and an issue recently raised in the Northern Ireland Audit Office: Planning in Northern Ireland report [NIAO Report - Planning in NI.pdf \(niauditoffice.gov.uk\)](#)

While the planning system has policies and tools available to support sustainable places, the best of tools require adequate resources to deliver, along with



support from stakeholders including statutory consultees, who play a vital part in delivering the planning system. The Northern Ireland Audit Office also addressed the role of statutory consultees in the planning system and found, “significant silo working within the planning system. ... We saw a number of instances where individual bodies – councils, the Department or statutory consultees – have prioritised their own role, budgets or resources, rather than the successful delivery of the planning service. ... It is crucial that all statutory bodies involved in the planning system play their part and fully commit to a shared and collaborative approach going forward”.

Monitoring against objectives and targets is an important element and contributes to a strong evidence base. The Measuring What Matters: Planning Outcomes Research (<https://www.rtpi.org.uk/news/2020/november/more-effective-way-to-measure-impact-of-planning-published-by-rtpi>) published in 2020 by the RTPI provides a toolkit to support moving towards an outcomes-based approach to measuring planning performance. The move away from a system of measuring process and speed to a more holistic outcomes and impact-based approach is widely accepted to be complex. However, it is equally recognised as “essential to determine whether and how the potential wider benefits of planning are being realised,” with the aim of better connecting policy, decision-making and quality of outcomes across social, economic and environmental contexts. The RTPI Measuring What Matters: Planning Outcomes Research stresses the importance of planning working collaboratively “with other agencies and sectors, to align strategic goals, indicators and investment priorities” to achieve meaningful impact.

A strong evidence base should provide the basis for all policy and practice and allows for a context specific, realistic, plan led approach, through the Strategic Planning Policy Statement (SPPS) and the emerging Local Development Plans (LDPs). Planning Policy Statement 18 on Renewable Energy was published in 2009 and requires urgent updating to take account of technological change and the developing policy context in Northern Ireland and global energy shifts.

“

A well-resourced,
plan-led, positive
planning service
can bring together
objectives across
services



Locational considerations

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 other types of renewables) development through identifying suitable and/or unsuitable areas in principle?

We would not support this proposal. Strategic planning policy would benefit from identifying broad areas which have the capacity to site wind and solar generation; the policy could also set out criteria against which proposals could be assessed. Individual sites should then be assessed on their own merit and factors such as environmental impact and community views be assessed through the planning system.

Siting new wind farms in perpetuity

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?

We do not support new wind farms being capable of being sited in perpetuity, simply due to the fact that technology changes over time and different options may need to be considered and utilised in the future.

Time-limited consents provide the opportunity to “review the site, to renegotiate community and environmental benefits and to assess what has changed”. ([25 years later... why are wind farms granted temporary planning consents and what happens next? – Dr Rebecca Windemer. Planning and Energy researcher \(wordpress.com\)](#))

While 25-years is not always the most appropriate duration, a time limited consent supported by open and transparent discussion between all parties regarding changing issues over the course of the consent, such as re-powering and life extension options could be helpful. However, we note this relies on collaborative working and effective communication, which we believe could be significantly improved within the NI planning system.

“

A well-resourced,
plan-led, positive
planning service
can bring together
objectives across
services



Wind turbines & amenity considerations

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

Each application needs to be assessed on its own merits based on planning policy, site specific noise and visual impact assessments etc.

Strategic planning policy is well placed to establish agreed criteria for the assessment of suitable sites.

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

No comment

Decommissioning and site restoration for new development

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

Recent research ([End-of-life challenges for onshore wind in Ireland – Dr Rebecca Windemer. Planning and Energy researcher \(wordpress.com\)](#)) has flagged up the important issue of decommissioning and reported that in practice decommissioning is not always properly planned for. “While most modern wind farms are likely to have conditions requiring removal of turbines that stop working, this may not be the case for all sites” and goes on to highlight cases where conditions have only required the removal of the turbine and not the associated infrastructure. The research recommends “greater consideration of decommissioning” to overcome the potential risk of abandonment of a wind farm. Guidance on the many issues surrounding wind farms, including decommissioning would be extremely useful for planners, including best practice examples.

“

A well-resourced,
plan-led, positive
planning service
can bring together
objectives across
services



Solar farms and agricultural land

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 best use of brownfield land and agricultural land for renewables should be considered through the LDP process.

Co-locating renewable, low carbon and supporting infrastructure

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?

While co-locating sounds a sensible approach, the issues paper provides little information on the benefits and impacts of the approach. It is therefore difficult to form a clear position without further information.

Re-powering existing wind farms

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?

We do not support new wind farms sited in perpetuity. See Q3. Instead, we support a collaborative approach with on-going, open and transparent discussion between all parties regarding changing issues over the course of the consent, such as re-powering and life extension. This open and efficient way of working could highlight issues as they arise and need to be addressed in a timely manner via the planning process, with all parties working together.

“

A well-resourced, plan-led, positive planning service can bring together objectives across services



Emerging technologies & other issues

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?

Multiple new technologies will be needed to meet challenging climate targets. Engagement with industry, Departments and other nations etc. is key to sharing expertise and efficient delivery.

The Northern Ireland Audit Office: Planning in Northern Ireland report [NIAO Report - Planning in NI.pdf \(niauditoffice.gov.uk\)](#) raises the skills of planners, finding that specialist skills are often lacking in local authorities. The skills of planners along with ongoing training for both planners and elected members, on emerging technologies, process and practice is an important factor in future delivery.

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?

Clear advice on the relevant issues associated with battery storage systems needs to be made available to provide planning authorities with the information for them to consider the material considerations in making decisions.

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 RTPI's research Planning for Smart Energy considers "‘smart energy’ in relation to national planning policy and guidance and the gap between what happens on the ground and the opportunities offered by smart energy" in the south west of England. It explores how the planning system can take a proactive, forward-looking and positive approach to supporting the UK's transition to a smart energy future."

<https://www.rtpi.org.uk/research/2019/july/planning-for-smart-energy/>

“

A well-resourced,
plan-led, positive
planning service
can bring together
objectives across
services