

# Response ID ANON-W4JV-KUSS-H

Submitted to Consultation on Design Considerations for a Renewable Electricity Support Scheme for Northern Ireland  
Submitted on 2023-04-25 15:33:14

## Introduction

1 What is your name? (optional)

Name:

Joanna Drennan

2 What is your email address? (optional)

Email:

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3 Are you responding on behalf of yourself, or on behalf of your organisation?

My Organisation

If you are responding on behalf of an organisation, please state the name of the organisation:

Royal Town Planning Institute

## Background

### Background

### Scheme Principles

4 Do you agree with the above principles?

Yes

Please provide evidence, where possible, to support your response.:

RTPI NI supports the encouragement and promotion of the generation of alternative forms of energy, particularly from renewable sources. In addition to the Renewable Energy Support Scheme, the RTPI would welcome a general promotion by the Department of the reduction of household energy usage in the interests of addressing climate change and securing long term fuel security.

### Scheme Design Type

5 Do you agree that a Contracts for Difference (CfD) scheme should be the preferred approach to supporting renewable electricity generation in Northern Ireland?

Not Answered

Please provide evidence, where possible, to support your response.:

### Scheme Design Type

6 Do you think that participation in a renewable electricity support scheme should be mandatory for all generators to ensure a longer-term fair and stable price for NI consumers?

Not Answered

Please provide evidence, where possible, to support your response.:

Whilst RTPI NI does not have a comment on this specific question, we recognise the need to ensure approaches include measures to ensure those who have financial difficulties are not disadvantaged and that any pricing mechanism also encourages positive behaviour change.

### Eligibility Criteria

7 What should be the minimum capacity for new sites to be eligible for a renewable electricity support scheme for Northern Ireland?

Please provide evidence, where possible, to support your response.:

Whilst RTPI NI is not in principle against installation of large-scale assets, care does need to be taken in their siting. There needs to be control regarding the cumulative impact of numerous installations in any particular area, especially with regard to visual impact, noise impact and impact on wildlife (such as the flight of birds and bats in the path of wind turbines). This also relates to individual and small-scale installations. Maintenance is essential to keep large scale assets running efficiently and, for instance, turbine noise at agreed levels.

It is important to have robust data to ensure that the assets are worth erecting and well sited to make best use of the renewable resource. If there is a minimum capacity set for new sites to be eligible for a renewable electricity support scheme, we would welcome encouragement of community schemes wherever possible to reduce the amount of hardware required and ensure appropriate setting within a locality.

8 Do you think the minimum capacity for eligibility should be technology specific?

Please provide evidence, where possible, to support your response.:

#### Eligibility Criteria

9 Do you agree that incentivising small-scale and microgeneration would not make a substantial contribution to reaching the Energy Strategy targets?

No

Please provide evidence, where possible, to support your response.:

RTPI NI supports the encouragement of the generation of alternative forms of energy, particularly from renewable sources. The domestic micro-generation of renewables should be promoted, where it is able to offer viable production. Large scale assets can often be contentious and take time to get approved and built. The newly-proposed permitted development rights for the installation, alteration or replacement of heat pumps (air source and ground or water) to align with modern standards and requirements, recently undertaken by the Department for Infrastructure, means that small-scale microgeneration assets can come forward more quickly and start supporting the energy targets.

10 Do you think a dedicated support scheme is required to incentivise deployment of small-scale/microgeneration assets even if it may not substantially contribute to the 80% target?

Please provide evidence, where possible, to support your response.:

Yes. The Department for Infrastructure recently consulted on changes to the nature and scale of permitted development rights for the installation, alteration or replacement of heat pumps (air source and ground or water) to align with modern standards and requirements. RTPI NI responded in support of this proposal. Air source heat pumps (ASHP) are a low carbon technology that extract heat energy from the air in order to warm houses and provide hot water. Ground source heat pumps utilise the latent heat which is found in the ground and use either vertical or horizontal coils to collect that heat. Water source heat pumps use submerged pipework to absorb energy from water sources such as lakes, ponds, rivers, aquifers and mine water. RTPI NI commended DfI in its initiative to make it easier for householders and businesses to install these renewable technologies. This is a positive step on the path towards making our energy supply more secure and less carbon-intensive, and micro-renewables such as ASHPs have an important role to play. The visibility of micro renewables within the urban environment will also raise awareness of the need to diversify our energy sources and energy use. Therefore RTPI NI would also support a dedicated support scheme for microgeneration assets.

#### Eligibility Criteria

11 Do you think that incentivisation within the renewable electricity support scheme for Northern Ireland should be tailored by technology type?

Please provide evidence, where possible, to support your response.:

12 If yes, what should the technology split look like and how should the budget be split across each technology type?

Please provide evidence, where possible, to support your response.:

#### Eligibility Criteria

13 Do you think flexible assets should be included in a renewable electricity support scheme for Northern Ireland, or is a separate support scheme preferable?

Please provide evidence, where possible, to support your response.:

#### Eligibility Criteria

14 Do you think community benefit should be included as an eligibility requirement for generators to qualify for a support scheme in Northern Ireland?

Please provide evidence, where possible, to support your response.:

Yes. In addition, time-limited consents provide the opportunity to review the site and the asset's data, to renegotiate community and environmental benefits and to assess what has changed.

15 If yes, what community benefit mechanism do you believe is most suitable to Northern Ireland?

Please provide evidence, where possible, to support your response.:

### Eligibility Criteria

16 Do you think there should be qualifying criteria for projects to be eligible to apply to the renewable electricity support scheme in NI?

Please provide evidence, where possible, to support your response.:

Yes: planning requirements, including environmental impact and community views.

### Contract Structure

17 What do you think is the optimal frequency for access to a support scheme for Northern Ireland?

Please provide evidence, where possible, to support your response.:

### Contract Structure

18 Given the information presented above, what do you think is the most appropriate agreement length for contracts within a renewable electricity support scheme for Northern Ireland?

Please provide evidence, where possible, to support your response.:

### Payment Structure

19 Given the options presented above, what do you think is the most suitable price clearing process for a support scheme for Northern Ireland?

Please provide evidence, where possible, to support your response.:

### Payment Structure

20 Given the information presented above, do you think strike prices should be indexed to inflation?

Please provide evidence, where possible, to support your response.:

### Payment Structure

### Emerging Options

### Additional comments

21 Do you have any further comments on design considerations for a Renewable Electricity Support Scheme for Northern Ireland?

Please provide evidence, where possible, to support your response.:

The RTP's research 'Planning for Smart Energy' (July, 2019) 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, using the south west of England as a study area. 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. This research found that the planning system has an important role to play in identifying how new development can integrate with existing assets, such as ensuring new developments connect to district heating systems or that electricity storage can be co-located with existing generation assets. Maximising the use of existing assets and the integration of low carbon energy sources with smart technology could significantly reduce the need for new infrastructure, and avoid contentious proposals being hard-fought through the planning system, as well as offering the most cost-efficient solution.

How we plan places, the standards of development required and the location of what is consented, will all affect emissions and the pace of decarbonisation. Planning can enable a place-based approach to development, which is well informed about local circumstances, to meet the needs of communities, whilst working towards a zero-emissions future. It also has the regulatory power to prevent unsustainable development, even if it is not always successful in doing so. Planning can also be a powerful proactive force for bringing together the diverse range of stakeholders who are needed to make change happen, including local communities, businesses and investors.

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 pressure and scrutiny, with specialist resources under particular strain. The adequate resourcing of the planning system is a key factor in delivery of a low carbon future, and an issue recently raised in the Northern Ireland Audit Office report: Planning in Northern Ireland (2022). Whilst 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. Therefore, a holistic approach needs to be taken if we are to achieve net zero carbon and affordable energy, in line with UK Government commitments, by 2050. This includes proper resourcing and support of the planning system.