

# ***Wind Energy Development in Northern Ireland's Landscapes - Draft Supplementary Planning Guidance to PPS 18.***

## **Where does the Northern Ireland wind industry stand?**

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**Enviros Consulting Belfast**

**British Wind Energy Conference**

**22<sup>nd</sup> October 2008**

# Introduction to Enviros



- No.1 Brand in environmental consultancy - ENDS survey 2007
- Established for over 30 years
- Offices throughout the UK and Ireland
- Windfarm EIA expertise
- Landscape and Visual Impact Assessment expertise

# Windfarm EIA

- Completed over 50 onshore and offshore wind projects in UK and Ireland
- Recent work on projects for SSE, Airtricity, N Power Renewables, Scottish Power, Eurus Energy, RES, TCI Renewables, SWS Group
- Over 30 EIA consultants working on wind projects across UK and Ireland
- In house specialist teams for LVA, Noise, Hydrology, Hydrogeology, Air quality, Ecology.
- Currently active on 5 sites in NI

# Landscape Capability

Expert witness capability



8 landscape architects UK wide coverage

# Presentation running order

- Policy Background
- Content of the Draft SPG
- Enviros study findings
- Implications for wind industry and energy targets
- Present position
- Industry objectives

# Policy Background

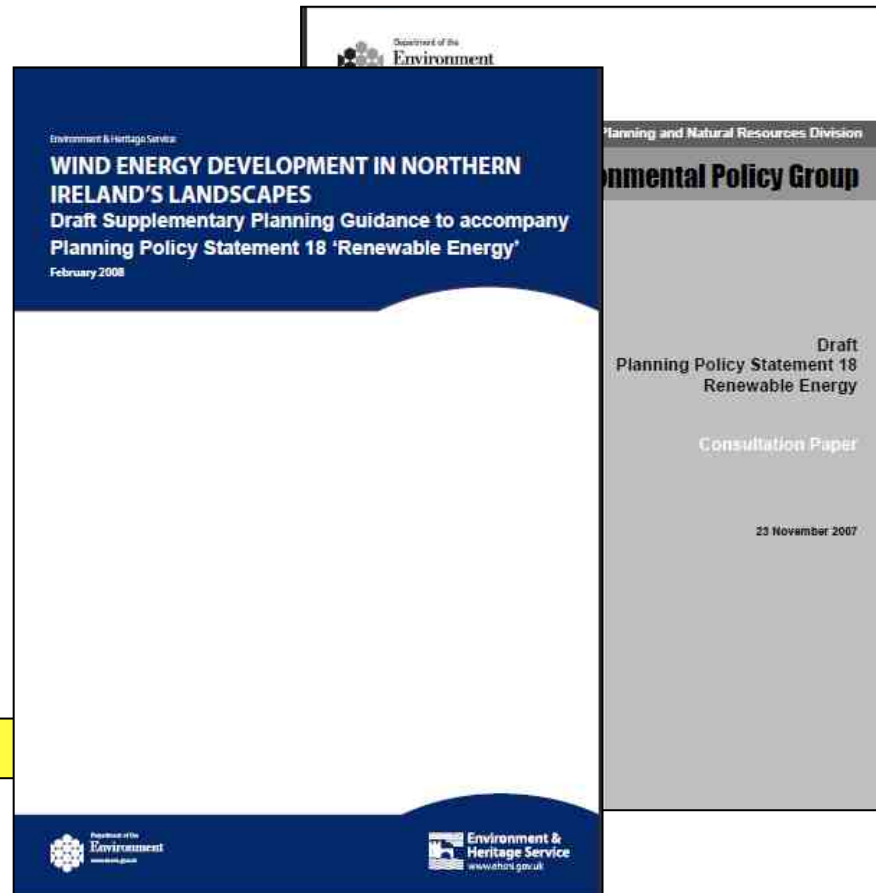
Policy makers;

Department of Environment NI and its agencies;

- **Northern Ireland Environment Agency**
- **Planning Service**
- **Planning and Environmental Policy Group**
- **Landscape Architects Branch**

Draft PPS18 consultation - 23rd November 07 - 21st March 08

Draft SPG consultation - 14th February 08 - 5th June 08



## Scope of Draft SPG

- Purpose of the Draft SPG is to *“assess the capacity of the landscape, including Areas of Outstanding Natural Beauty, to accommodate windfarm development”*.
- Uses the 130 Landscape Character Areas previously identified in the NI Landscape Character Assessment 2000.
- Draft SPG document is a report by a team of landscape architects which describes the sensitivity and capacity of each LCA in terms of windfarm development
- The Draft SPG assigns capacity to each of 130 LCAs - type and number of windfarms that can be accommodated

## Key Issues Raised

The publication of the Draft SPG raises a number of key issues for the wind industry in Northern Ireland;

- Policy is extremely prescriptive in terms of turbine heights and groupings;
- Planning policy is prepared without due regard to UK energy policy;
- Policy makers do not appreciate industry constraints in terms of turbine size, availability and the commercial viability of small turbines;
- Policy makers do not treat the wind industry as an indigenous industry to be promoted;
- Policy makers did not adequately consult the industry during the preparation of policy.

## Industry response

- Initiated contact with policy makers to comment on the Draft SPG;
- Presentations to Ministers and senior officials in Department of Trade and Industry and the Department of Environment;
- Sought independent technical advice from Enviros to investigate quality of Draft SPG;
- Sought additional independent legal advice.
- Strongly worded submission to DOENI during public consultation
- Ongoing interaction with policy makers

# Enviros Study

Enviros was commissioned by the BWEA in May 2008 to carry out a critique of the Draft SPG. The scope of the study was to;

1. Determine the rationale behind the use of the 130 landscape areas;
2. Assess the extent to which the development of the Draft SPG aligns with 'best practice' methodologies;
3. Determine the repeatability of the methodology used;
4. Determine the use-value of the Draft SPG from both the developer and planner perspective;
5. Determine the potential MW capacity for NI under the Draft SPG criteria

## Project Details

**Start Date:** 2<sup>nd</sup> May 2008

**Interim Report:** 9<sup>th</sup> May 2008

**BWEA meetings with NI Government:** 13<sup>th</sup> – 15<sup>th</sup> May 2008

**Final report and submission of comments:** 5<sup>th</sup> June 2008

**Project Director:** Peter Moynan

**Project Manager:** Gavin Forkan

**Landscape Director:** Zosia Mellor

**Landscape Architect:** Peter Dunmow

# Summary Findings

1. Draft SPG is more prescriptive in definition of capacity than other comparative documents and methodologies including TAN 8;
2. The use of 130 LCAs is not appropriate for the scale of development;
3. Level of field assessment insufficient to enable prescriptive estimates of capacity to be made;
4. Capacity assessment not valid - using sizes of turbine not commercially available;
5. Methodology not repeatable and does not form a sound basis for developers and planners to make decisions.

# Additional Findings

The definition of the vast majority of LCAs as being highly sensitive is surprising and may be the result of a conservative approach to analysis.

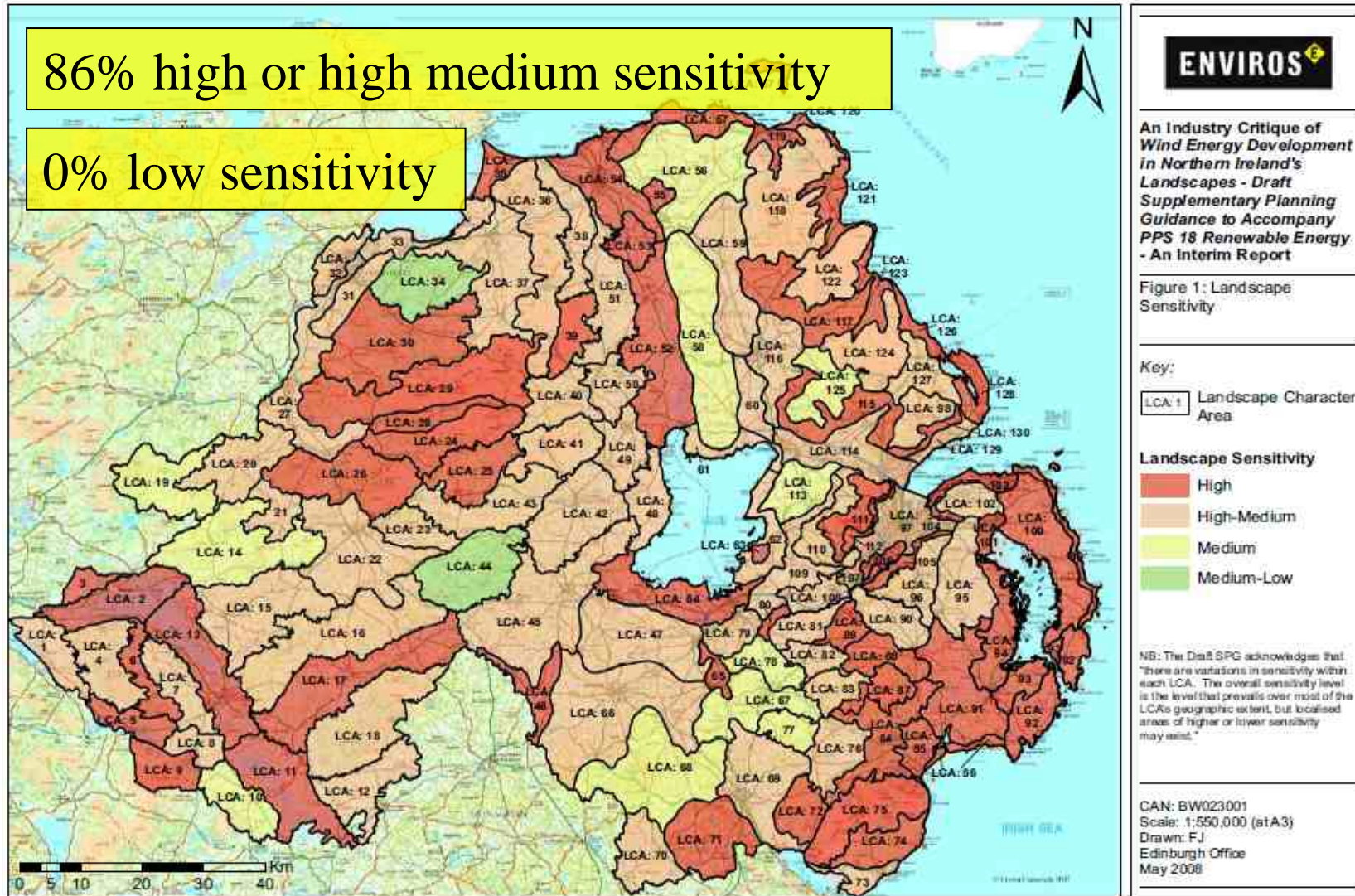
Northern Ireland has no landscape character areas of low sensitivity.

Sensitivity Class	Number of LCAs in each class	% of LCAs in each class	% land area in each class
High	59	45	37
High-Medium	58	45	49
Medium	11	8.5	12
Medium-Low	2	1.5	2
Low	0	0	0
Total	130	100	100

**86%**

86% high or high medium sensitivity

0% low sensitivity



# Landscape Architects Critique

- Landscape considerations should be only one of a number of factors to be considered when assessing a windfarm proposal;
- The Draft SPG does not acknowledge the role of EIA screening and scoping as the method of initially assessing potential developments;
- The Draft SPG should be expanded to include discussion of all six distinctive landscape areas in Northern Ireland;
- The issue of transboundary impact with ROI has not been adequately addressed;
- A full description of the graduations of landscape sensitivity needs to be clearly set out.

# SPG Impact on Wind Industry

The Draft SPG recommendations were translated into potential MW build per LCA.

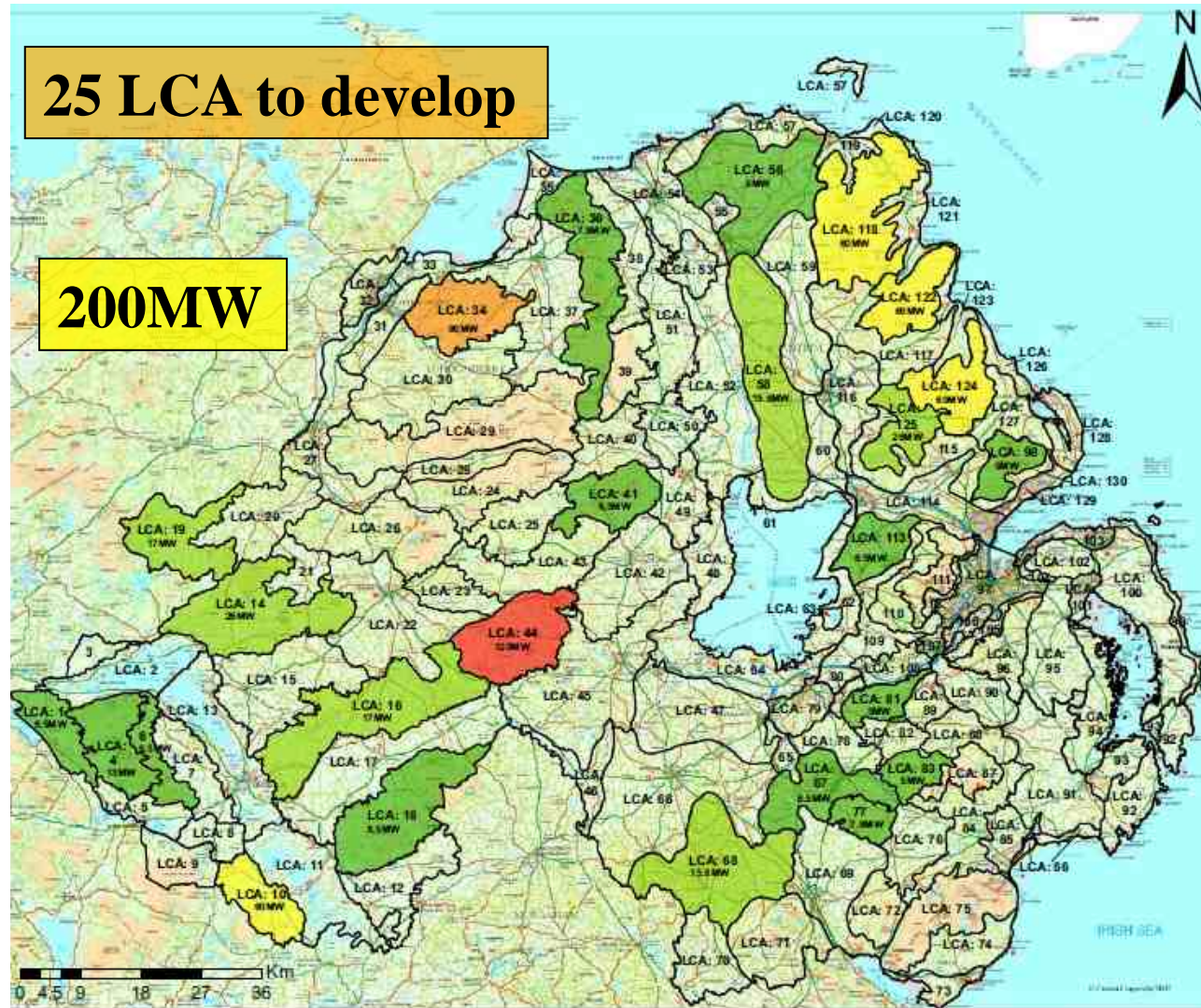
Three potential scenarios were developed;

- Scenario A – a stringent application of the Draft SPG = **657MW**
- Scenario B – a neutral application of the Draft SPG = **1052MW**
- Scenario C – a favourable application of the Draft SPG = **1509MW**

Some **450MW** used up by existing proposals granted permission.

**25 LCA to develop**

**200MW**



**An Industry Critique of Wind Energy Development in Northern Ireland's Landscapes - Draft Supplementary Planning Guidance to Accompany PPS 18 Renewable Energy - An Interim Report**

Figure 3; Scenario A - Potential MW Capacity based upon a stringent interpretation of the SPG (656.8 MW)

Key:

LCA 1 Landscape Character Area (LCA)

**MW Capacity Scenario A**

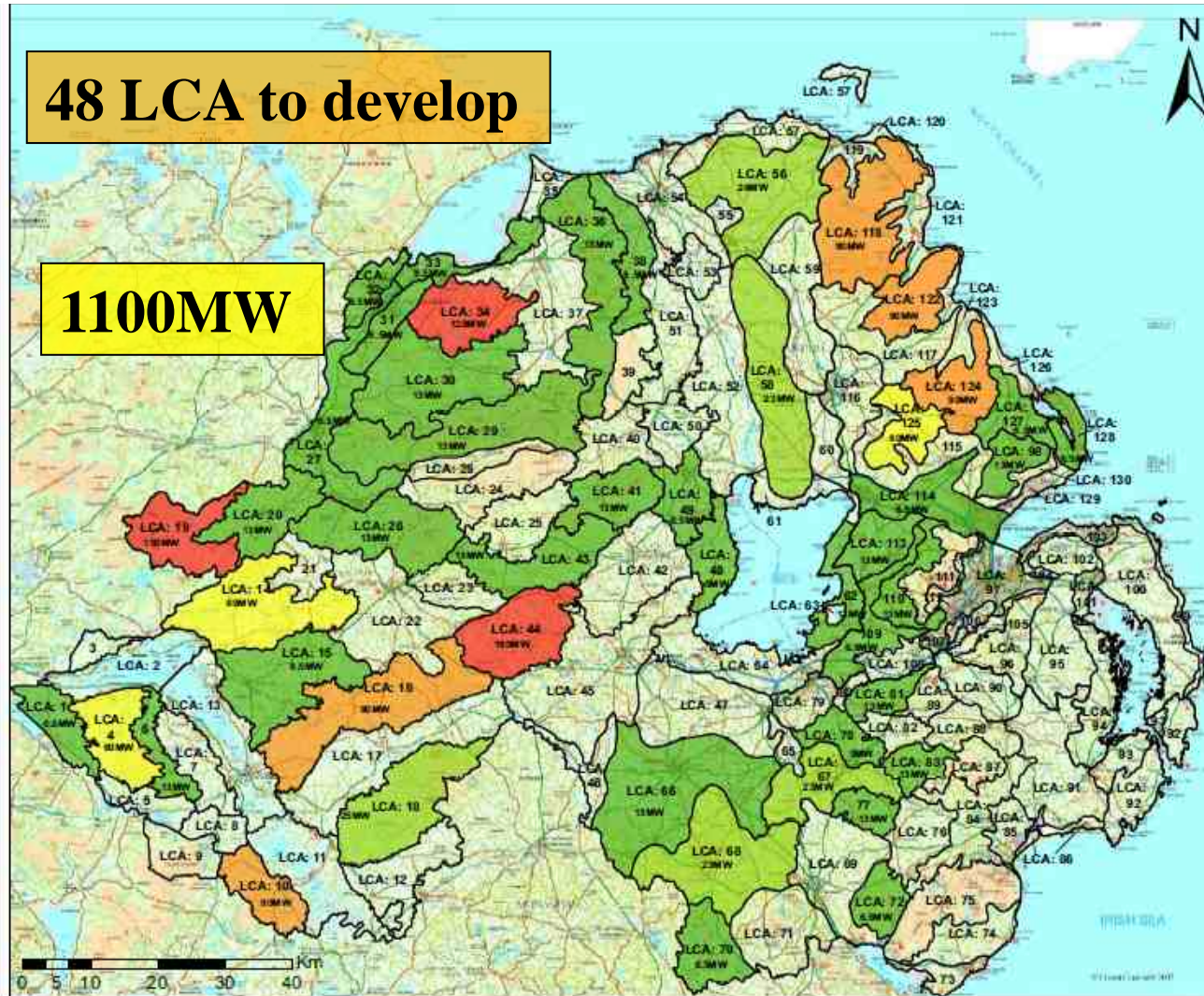
- 5 - 13
- 13 - 26
- 26 - 60
- 60 - 90
- 90+

The MW figures have been calculated using the statements on capacity in Annex 1 of the draft SPG. A proportion of the capacity has already been allocated to built and contracted schemes. However, this allocation has not been deducted from the figures shown on this plan.

CAN: BW023001  
 Scale: 1:550,000 (at A3)  
 Drawn: FJ  
 Edinburgh Office  
 May 2008

**48 LCA to develop**

**1100MW**



**An Industry Critique of Wind Energy Development in Northern Ireland's Landscapes - Draft Supplementary Planning Guidance to Accompany PPS 18 Renewable Energy - An Interim Report**

Figure 5: Scenario C - Potential MW Capacity based upon a favourable interpretation of the SPG (1509 MW)

Key:

LCA: 1 Landscape Character Area (LCA)

**MW Capacity Scenario C**

- 5 - 13
- 13 - 26
- 26 - 60
- 60 - 90
- 90+

The MW figures have been calculated using the statements on capacity in Annex 1 of the draft SPG. A proportion of this capacity has already been allocated to built and consented schemes. However, this allocation has not been deducted from the figures shown on this plan.

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 May 2008



# Potential Impact on Renewable Energy Targets

- NI target to supply 12% of total electricity from renewables by 2012 and 40% by 2025;
- Approx 30 operational windfarms making a contribution of approx 400MW to the grid;
- Additional 1300MW in planning process;
- On current information it is likely that Northern Ireland will meet its stated 2012 target;
- If Draft SPG is adopted in its current form it will constrain the industry and is likely to lead to failure to meet 2025 target.

# Consultation with Policymakers

- **13<sup>th</sup> May 2008** – met with Minister for Environment, Arlene Foster MLA;
- **15<sup>th</sup> May 2008** – presentation to NI Assembly Environment Committee;
- **5<sup>th</sup> June 2008** – submission to DOENI on SPG;
- **28<sup>th</sup> July 2008** – present findings of Enviros report to DETINI and DOENI;
- **August 2008** – submit comments on Draft SPG text;
- **4<sup>th</sup> September** – meet with DOENI, Planning Service, NIEA to discuss text of SPG;
- **October/November 2008** – DOENI response to industry position expected;
- **November 2008** – expected final meeting with DOENI

## Current Position

- Both Draft PPS18 and Draft SPG remain Draft until formally adopted by Minister for Environment;
- Final Form publication date for both 30<sup>th</sup> April 2009;

### **BUT**

The Planning Service has recently used the Draft SPG for refusal of current applications;

DOENI has instructed the Planning Service that the Draft SPG should not be given determining weight in deciding an application;

Current industry position uncertain

# Industry Objectives

Changes to Draft SPG to include;

- Remove turbine height constraints;
- Removal of turbine grouping specifications;
- Revisions to negative language used in Draft SPG;
- Significant changes to LCA sensitivity ratings;
- Alignment of SPG and PPS 18 with energy policies;
- Acknowledgment of the role of EIA in design and planning process.

# THANK YOU FOR YOUR ATTENTION

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