Causeway Coast & Glens Borough Council

Planning Department
Cloonavin
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consult.soni.ltd.uk/

Date: 8th January 2024

Dear Sir/Madam,

Re: Draft Transmission Development Plan Northern Ireland and SEA 2023-2032

In response to the public consultation on the above, I wish to make the following comments on behalf of the Council's Planning Department:

We welcome the opportunity to comment on the dTDPNI and appreciate the challenges of transforming the energy system in the context of the goals outlined in the Climate Change Act (Northern Ireland) and ongoing economic constraints.

The dTDPNI outlines an ambitious programme of works aimed at transforming energy supply in NI, described in the executive summary as "the most significant in its scale and impact since rural electrification and it is a mission-critical step on the journey to net-zero carbon emissions by 2050".

This change in energy supply is characterised by a shift away from centralised power stations, supported by networks of delivery infrastructure, to a system based on networks of power generation (mostly renewables), connected by networks of transportation and delivery infrastructure.

We would have some concern that the strategic direction of the Plan will result in a disproportionate level of development being focused within the northwest Planning Area.

The projects outlined in the plan will support and promote significant growth in the renewables sector, with most of the new infrastructure located within the northwest planning area. Section 7 of the Plan describes the northwest planning area as, "characterised by a significant amount of wind generation, with more generation than demand." It goes on to state: "Significant further generation is expected in this area over the coming years, most, if not all, of which is expected to be renewable in order to meet the 80% target. To cater for the high levels of generation described above network reinforcement is necessary. This will enable the efficient export of

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generation from this area towards areas with high load, such as the South-East."

There is no evidence to support the assumption that significant further generation is expected in this area over the coming years. Yet justification for the projects outlined in the plan are repeatedly described as, "As a result of increasing growth in renewable generation in the northwest of NI there will be a need to…". Given that the area has more generation than demand, it is highly unlikely that the area will see increased generation without the infrastructure projects outlined in the dTDPNI.

This is critical to our concerns in relation to the dTDPNI. The Plan and the associated Strategic Environmental Assessment (SEA), consider the likely environmental impacts of the projects outlined in the dTDPNI. However, they do not assess the direct and indirect significant effects of the proposed development, as is required under the Planning (Environmental Impact Assessment) Regulations (NI) 2017. This is despite the Plan describing the proposed projects as "critical enabling infrastructure in the realisation of the Northern Ireland Energy Strategy and Climate Change Act."

Paragraph 3.5.2 describes the statutory environmental consideration of the Plan and the need for appropriate assessments. The approach focuses on the impact of individual projects. These often fall outside the thresholds outlined in the EIA regulations, with many of the proposed projects being 110kv lines, with the threshold set at 220kv. It is important to consider that subsequent applications for renewable energy will be a direct result of the dTDPNI and should be assessed within the SEA.

The general location of renewable energy development will largely be predetermined by the availability of infrastructure to transport and deliver the generated electricity to areas with high load, such as the southeast or beyond via the Moyle interconnector. The fragmented nature of the renewable energy industry and the way the Plan will be implemented, effectively commits the northwest to the delivery of large-scale energy production, without appropriate assessment of the environmental impacts. This is comparable to assessing the environmental impact of a power station, solely on the impacts of the associated energy transportation infrastructure.

Section 4.1 is entitled, Our Approach to the Environment. It lists SONI's policies and objectives in relation to environmental issues, including Biodiversity, Climate Change and Cultural Heritage. The scope of the impacts is limited to the transmission infrastructure and makes no reference to the development that the infrastructure enables.

Paragraph 4.1.7 outlines the policy and objectives of SONI with regards consideration of landscape. The approach again focuses on the appraisal of transmission development in isolation, with no consideration of the associated development over the plan period, and the resulting cumulative impact on the landscape of the northwest.

In the context of the dTDPNI, the continued relevance of the Northern Ireland Landscape Character Assessment 2000 as an appropriate evidence base is questionable. The NILCA 2000 and the evidence which supports it were developed over 25 years ago, prior to significant growth in renewable energy infrastructure in the northwest.

The impact of the dTDPNI on the landscape of the northwest will likely be significant. Given the scale of the infrastructure upgrades proposed, and the level of energy generation development required to meet Northern Ireland's energy ambitions, the Plan could significantly alter the landscape character of the area. It would therefore be appropriate for the energy industry to undertake a robust landscape assessment and sensitivity analysis, to determine if the northwest has the capacity to absorb this level of development, prior to the adoption of the plan for the enabling infrastructure.

It is noted that the Habitats Regulation Assessment also looks at projects in isolation and fails to consider the cumulative impact of associated energy generating development. Given the correlation between the areas of upland often favoured for wind energy development and areas of active peatland, it would be appropriate to undertake a detailed assessment of potential development. A failure to appropriately assess the capacity of the landscape to absorb the levels of energy development required could undermine the objectives of the Climate Change Act, such is the importance of active peatland in sequestering carbon dioxide.

The dTDPNI responds to the oversupply of renewable energy development in the northwest, which has largely been dictated by energy companies seeking to maximise productivity. Given the implications of the Plan for the landscape across the northwest this would not appear to be a sound basis for the development of an energy strategy.

There is also no evidence to support the role of the northwest as the focal point of wind energy generation. Available data on wind speed and power reflects a relatively even distribution across Northern Ireland. Whilst the northwest may experience optimal conditions, the data indicates that within the southeast there are comparable conditions which would more than support commercial energy generation.

Clearly it is more cost effective to concentrate infrastructure in one region as opposed to a balanced distribution which would require additional network infrastructure. However, the long-term implications for both the natural environment and tourism economy have not been fully explored. An even distribution of infrastructure would develop a more secure and robust network, better equipped to absorb potential outages and avoiding overreliance on a particular region or connector.

It is accepted that the targets outlined in the Climate Act place significant pressure on the energy industry to work towards decarbonisation. However, it is worth taking

the time to ensure that the measures introduced are achievable without causing lasting detrimental impact.

Given the importance of this Plan in meeting Northern Ireland's energy and climate change ambitions there is perhaps a lack of transparency in relation to the aims and objectives of the Plan. Renewable energy has a critical role to play in the journey to net-zero carbon emissions. However, renewable energy development can be contentious and public opinion on visual impact remains guarded, as was evident during public consultation on the Council's Preferred Options Paper.

The absence of a strategic energy plan which clearly defines the implications of the dTDPNI limits the conversation. There is perhaps a need for a clear discussion as to whether it is appropriate and fair for the northwest planning area to accommodate the energy generating development to serve the southeast area and beyond, given the potential for visual and general amenity impacts.

Thank you for the opportunity to comment and I trust the above comments will be considered and reflected in an updated dTDPNI.

Yours sincerely,

[redacted]

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