

Ref: COR 2020 340

11 December 2020

By e-mail only:

info@soni.ltd.uk

Subject: Response to TDPNI Consultation



Planning Service
2 Church Street
Newtownards
BT23 4AP

Dear Sir/Madam

RE: DRAFT Transmission Development Plan Northern Ireland 2020-2029 consultation

Thank you for your recent consultation on above mentioned document and opportunity to make comment. Please treat this reply as a response on behalf of the Ards and North Down Borough Council's (ANDBC) Planning Service.

The Planning Service notes issues related to how SONI must limit the amount of wind energy deployed across the grid due to potential instability related to capacity issues. It is noted from the TDPNI 2020-29 that SONI propose a number of essential upgrades to the Northern Ireland grid, including modernising parts of the grid in the Belfast Metropolitan Area, so that it can fuel long-term economic growth in the city centre. You will note from the Ards and North Down Borough Council's draft Corporate Plan the aspiration for sustainable growth within the Borough.

As you shall be aware, the Council published a Preferred Options Paper (POP) in 2019 related to the forthcoming Local Development Plan (LDP). Work continues on preparation for the first formal document of the LDP, the draft Plan Strategy which shall contain the Council's locally distinct operational planning policy (once the LDP is adopted).

As part of the Belfast Region City Deal group, this Council seeks to bring forward projects related to significant waterfront redevelopment, digital infrastructure and related innovation hub and multi-use recreational facilities.

The Council declared a climate emergency in February 2019 in response to climate change. The Council's draft Corporate Plan seeks to encourage the whole Borough to reduce carbon usage. ANDBC's Planning Service recognises that it is SONI's intention 'to facilitate decarbonisation of Northern Ireland's electricity supply'.

In terms of a general comment, the Planning Service welcomes the commitment to early, meaningful, transparent engagement and the consultation processes that have been put into place by SONI. Early engagement with ANDBC's Planning Service for all proposed grid development projects is encouraged – particularly where these are located within sensitive landscapes.

Chapter 4 – Implementation

4.1 Approach to the Environment

It is noted that policies and objectives as set out seem to be broadly in line with the Strategic Planning Policy Statement (SPPS) and extant policy. We welcome the commitment to have regard to Planning Policy Statement (PPS) 15: Planning and Flood Risk in the preparation of grid development strategies and plans and would respectfully suggest that regard be had to all of the relevant retained extant PPSs and SPPS where applicable (e.g. PPS 2 Natural Heritage, PPS 6 Planning Archaeology and the Built Heritage, PPS 16 Tourism, PPS 18 Renewable Energy¹ etc.) – please note this is a non-exhaustive list.

Please note once a Council's draft Plan Strategy has been formally adopted the PPSs will cease to have effect in that area.

ANDBC has declared a Climate Emergency and welcomes commitment to integrate measures related to climate change into grid development, by way of both effective mitigation and adaptation responses. Current policy is contained within the SPPS and PPS 18: Renewable Energy. Forthcoming LDP policy in relation to renewables is likely to include consideration of energy storage and integration of on-site generation.

4.2 Approach to Technology

ANDBC's Planning Service welcomes the new approach to planning for the grid on a future scenario basis which incorporates increased use of renewables to contribute towards net-zero emissions targets.

4.3 Approach to Project Development

We welcome focus on sustainable development in the development of SONI grid projects.

4.4 Approach to Planning and Consenting of Projects

The focus on sustainable development and the recognition of public participation being of key importance alongside the environmental and ecological impact of the projects is welcomed. It is considered that Policy PCP 1 would benefit from referencing the relevant planning policy at this point to include the SPPS, retained PPSs and the Local Development Plan (once adopted).

¹ Retained Planning Policy | Department for Infrastructure ([infrastructure-ni.gov.uk](https://www.infrastructure-ni.gov.uk))

4.5 Approach to Consultation and Engagement

ANDBC's Planning Service welcomes the approach but note that it could benefit from explicit mention of local councils as the planning authorities and key stakeholders with whom early engagement is essential.

Planned Projects:

The intention to replace the 110 kV structures and disconnectors at Rathgael with a completion date post 2024 is noted.

Thank you for the opportunity to comment on the draft.

Yours faithfully

Leona Maginn MRPTI
Principal Planner
Local Development Plan

