**SONI Draft Transmission Development Plan for Northern Ireland 2021 – 2030**

**Newry, Mourne and Down District Council – Consultation Response**

The Council is currently preparing its Local Development Plan (LDP) for the period until 2030, as part of this process all of the existing suite of planning policies contained in Planning Policy Statements produced by Central Government will be reviewed. This includes PPS 18 Renewable Energy. Once the plan strategy of the LDP is adopted, the policies that will be set out in the LDP will guide development until 2030 and beyond, this will coincide with the timeframe of the Transmission Development Plan (TDP). 2030 is also the target date set under regional policy for Northern Ireland to source 70% of its energy requirements from Renewable Energy Sources (RES) as a stepping stone towards Net Zero by 2050 and therefore the changes needed to our energy supply in this decade will be crucial to achieving those goals.

In order to contribute towards these objectives, the Council is seeking to encourage a greater use of renewable energy technology, including a greater use of technologies that have not been extensively utilised to date such as solar/photovoltaic and biomass in addition to wind energy which has been to date the primary mode of generation. The Council considers that there is significant potential for renewable energy to be sourced from within its district, as well as the potential for offshore wind energy development. The final version of SONI’s ‘Shaping Our Electricity Future’ (November 2021) identified an area off the Mourne Coast as the optimal location for a demonstration project. However, the Council notes that there is no reference to this project in the Draft TDP, though it does accept the recognition that the list of projects is not definitive and that the Plan needs to contain sufficient flexibility. In particular, the reference to the range of scenarios that will be produced every 2 years in consultation with industry experts and other stakeholders could provide an opportunity for this project to be incorporated into the Plan at a later date. It is hoped that the offshore demonstration project and other significant RES projects will be incorporated during the Plan’s life as they are initiated by operators.

The Council acknowledges that it will be particularly challenging to connect new RES projects in rural areas, particularly in upland or border areas which is where a significant number of new onshore wind projects would need to be to utilise this resource. The Council considers that the amount of infrastructure needed could be minimised by increased use of technologies such as solar/photovoltaic or biomass that can be located closer to end users and therefore could utilise existing infrastructure. This is one of the reasons why the Council is considering introducing dedicated planning policies for these technologies to try and encourage a greater uptake of them as the goals for decarbonisation and Net Zero cannot be achieved with an over-reliance on a single technology. In addition, broadening the range of sources that supply energy will improve the security of the energy supply.

The Draft TDP’s emphasis on early consultation with local communities and landowners in the initial stages of projects is welcome as such contact can often help to ensure that projects are designed in such ways that take account of local concerns. There are many instances where operators have agreed to supply electricity to host communities at discounted rates and this has helped to secure local support for the projects. While this is a matter for future operators the Council would be supportive of measures to ensure that such communities directly benefit from these projects.

The Council also welcomes SONI’s recognition of the important role that discussions with planning authorities at pre-application stage can play in identifying potential issues at an early stage. The importance attached in the Draft TDP to Environmental Impact Assessment, Appropriate Assessment and other consents is welcomed as it is the Council’s experience that a significant cause of delay in the planning system is the failure of applicants to provide such information or to omit important parts of it.

The Council welcomes the commitment of SONI in the final version of ‘Shaping Our Electricity Future’ for regular consultation with Planning Authorities to advise on future projects in their areas, the Council will work constructively with SONI, NIE Networks and RES operators at all stages of the process to ensure that the goals of 70x30 and subsequently Net Zero are achieved.

Overall the Council is supportive of the Draft TDP as it potentially can support and underpin the new policies on renewable energy development that will be brought forward by this Council and other Planning Authorities, and it will be reviewed regularly to incorporate new RES proposals as they are brought forward. It is hoped that these will in future include the offshore wind demonstration project and others within Newry, Mourne and Down.