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Development Plan Team,
Planning Department,
Mid Ulster District Council,
50 Ballyronan Road,
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DevelopmentPlan@midulstercouncil.org

18th April 2019
[By email]

Re: Submission to the *Draft Plan Strategy for the Mid Ulster District Council Local Development Plan 2030*

Dear Sir/Madam,

SONI welcomes the opportunity to comment and requests this submission is taken into consideration in the preparation of the Plan.

SONI is responsible for a safe, secure and reliable supply of electricity – now and in the future. SONI develops, manages and operates the electricity transmission grid. This brings power from where it is generated to where it is needed throughout Northern Ireland. The grid also supplies power to industry and businesses that use large amounts of electricity and powers the distribution network. The distribution network in turn supplies electricity to homes, businesses, schools, hospitals, and farms.

The electricity transmission grid's importance in supporting our society and economy should not be understated in the Local Area Plan. SONI values the inclusion of policies and objectives in the future Plan to protect strategically important utilities infrastructure, such as the electricity transmission grid and to improve connectivity, in terms of electricity, within the Council Area and to adjoining jurisdictions. All inclusions in Local Development Plans which support the safe, secure and reliable supply of electricity are supported by SONI as this facilitates SONI's objective of successfully implementing its strategy for grid development, which is imperative to meeting targets for electricity generation, climate change, and security of energy supplies.

SONI therefore notes and welcomes reference to the North South Interconnector in Section 21.4 of the draft Plan Strategy. The North South Interconnector is a vital project for Northern Ireland which will improve the security of electricity supply. It will reduce costs and ultimately save money for the electricity consumer. This project will achieve this by increasing the capacity of the electricity network in the region. This will help to attract inward investment and jobs.

In relation to *Policy TOHS 1 Outside of Areas of Constraint on Wind Turbines and High Structures*, SONI would question whether this draft Plan Strategy policy satisfies the test of soundness on the grounds of its flexibility to enable it to deal with changing

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circumstances. A flexible approach should be adopted to essential electricity infrastructure projects which are required to support economic and social development.

SONI understands the principle underlying the policy and will always seek to comply. SONI carefully plans its routes and sites for new transmission grid infrastructure based on a careful consideration of a wide range of issues. The final route for any line is a carefully considered balance of technical, planning, environmental considerations. Where it is not possible to follow natural features of the environment because, for example, of the need to avoid areas of significant population, natural and built heritage or existing electricity infrastructure SONI will always explain this as part of its substantive reasons for the route design.

We request that the planning authority make the minor amendments to draft policy TOHS 1 as set out at **Annex A**, where the policy for overhead cables clearly distinguishes between whether the cables are proposed in an area which is inside or outside Areas of Constraint on Wind Turbines and High Structures. We suggest Policy TOHS 1 is split into separate policies TOHS 1 and TOHS 2 as shown in **Annex A**. Moreover, we make some minor text amendments to policy TOHS 1 to allow for flexibility in the policy consistent with criterion CE4 (reasonably flexible to enable the Plan Strategy to deal with changing circumstances) of Development Plan Practice Note 6. Changes are **highlighted in red** for convenience.

SONI would welcome the opportunity to meet with the planning team at Mid-Ulster Council to explore the matters raised in this submission and formulate provisions in the Plan that reflect the requirements of the electricity transmission network.

Should you have any comments in regard of this submission please contact the undersigned. SONI once again welcomes the opportunity to participate in the making of the new plan and look forward to making further submissions in due course.

Yours faithfully,

Tomas Bradley, MRTPI
Senior Planner
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Annex 1

POLICY TOHS 1 – OUTSIDE AREAS OF CONSTRAINT ON WIND TURBINES AND HIGH STRUCTURES

Outside of Special Countryside Areas and Areas of Constraint on Wind Turbines and High Structures telecommunications development (including necessary enabling works) and overhead cable development will normally conform with the Plan where;

- Siting and design of development, including any necessary enabling works will not result in a significant unacceptable impact on visual amenity and environmentally sensitive features and locations
- Operators can demonstrate the need for new telecommunications development, existing network constraints, potential effects of such development and measures to mitigate visual and environmental impacts.
- Applications for the development of telecommunications equipment should be accompanied by a statement demonstrating compliance with ICNIRP guidelines for public exposure to electromagnetic fields.
- Operators are able to demonstrate that the development shall not cause undue interference to radio spectrum users.
- In the case of overhead cables, the chosen route follows as far as practical the natural features of the environment and in urban areas, wirescape is kept to a minimum with preference being given to undergrounding.

In the case of telecommunications development, new masts should only be considered where site sharing is not a feasible option or where it offers an improved environmental solution.

POLICY TOHS 2 – INSIDE AREAS OF CONSTRAINT ON WIND TURBINES AND HIGH STRUCTURES

Subject to the above considerations "set out in TOHS 1", telecommunications development, overhead cables and high structures will normally be restricted to 15 metres in height above original ground levels in Areas of Constraint on Wind Turbines and High Structures. Exceptions may be considered where it is demonstrated that the development is;

- An essential electricity transmission or supply which, if not provided, would result in demonstrable hardship
- Telecommunications apparatus to serve a recognised "not spot."
- For a farm structure essential for the operation of agriculture in that area.

Where the above exceptions apply, a 25 metre height restriction will be applied and the applicant will be required to demonstrate that they have given full consideration to the landscape sensitivity of the area.

Higher structures more than 25 metre height will only be considered if it is demonstrated that the proposal is of regional importance.