

DFI REVISED REGIONAL  
STRATEGIC PLANNING POLICY  
– RENEWABLE AND LOW  
CARBON ENERGY  
– PUBLIC CONSULTATION  
– NIE NETWORKS RESPONSE

June 2023

## **DfI Revised Regional Strategic Planning Policy – Renewable and Low Carbon Energy – Public Consultation**

**Q1: Do you agree, that overall, the revised policy will help to ensure that the planning system can play its part in supporting wider efforts of government in addressing climate change and decarbonising the energy sector? If not, please explain how the draft policy can be improved.**

NIE Networks acknowledges that changes to extant planning legislation (including permitted development rights) or regional planning guidance on renewable and low carbon energy are outside the scope of this review. As a result, the major issues faced by all parties wishing to develop renewable infrastructure in Northern Ireland (generation infrastructure and grid infrastructure) will not be addressed and therefore the full benefit of changes proposed in this consultation will not be realised.

NIE Networks welcomes that the revised policy seeks to facilitate the delivery of energy and climate targets. However renewable generation connection applicants have continually voiced their concern to NIE Networks about the time it is taking to obtain planning for projects. It is not clear from this consultation how this process will be sped up. Renewable generation developers (large and small scale) have requested that NIE Networks considers changes to connection deadlines that can be made to account for delays caused by the planning process. The lack of a consistent approach in terms of policy and approval timelines results in an inefficient and prolonged process that will not help address the Climate Emergency.

While section 1.27 states that “some proposals for renewable and low carbon energy development may require a connection to the National Grid”, NIE Networks would note that for developments to contribute to renewable generation targets they will require a grid connection. This does not preclude developments that are designed to be off-grid, but to achieve the aims of maximising generation and meeting targets then there is a need to be connected. Connections infrastructure, and wider system reinforcement, including overhead lines, underground cables, substations, towers and associated equipment, are required to enable the efficient dispatch of the generation and operation of the Single Electricity Market, so should also be covered within the new SPPS.

There is a general focus on renewable generation and specific support for battery storage (sections 1.5, 1.24), but rather less emphasis on the network infrastructure needed to facilitate growth in system demand as a result of decarbonising the energy sector. NIE Networks would like to highlight the necessity for network infrastructure projects to be facilitated in a timely and cost-effective manner in order to connect and facilitate the efficient operation of renewable generation, storage and additional electrical demand to facilitate the electrification of other industries e.g. heat and transport.

**Q2: Do you agree that the new provisions for a spatial approach through LDPs will assist in providing certainty and clarity to planning authorities, communities and developers alike by providing a presumption in favour of development in areas identified in LDPs? If not, please explain how the draft policy can be improved.**

NIE Networks would like to highlight the risk that areas identified in LDPs may not align with existing available network infrastructure/capacity. Failure to align with available network capacity will result in the need for further network development, which under the current distribution charging methodology will be chargeable to the connecting customer. This can act as a barrier to connection and thus the achievement of Northern Ireland’s renewable energy targets. To avoid this, NIE Networks would welcome engagement throughout the LDP development process to provide expert advice on the network capacity available in the areas and plans for future development.

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The current regulatory structure in Northern Ireland does not allow for anticipatory investment in the electricity distribution network (with the exception of Cluster substations), so simply identifying a geographic area does not mean that network infrastructure can be developed to create capacity in advance of need.

The proposal outlined in the consultation would benefit from more detail around how the areas will be identified within the LDPs. NIE Networks has a well-established methodology known as the Cluster Methodology (found in Appendix 2 of NIE Networks Statement of Charges for Connection to the Northern Ireland Electricity Networks distribution system<sup>1</sup>), in which the need for distribution and transmission development is identified ahead of connection applications, and is based on publicly available information on renewable generation projects in the NI Planning Portal. This approach is based on minimising the total length of network infrastructure needed to connect renewable generation projects. It is not designed to influence the location of the renewable generation projects, as there are other factors, such as renewable resource availability, that will have a much larger influence on the location of the generation.

Through experience of the devolved planning process and feedback from customers, NIE Networks are concerned about the potential for lack of consistency between areas based on how LDPs are developed. There is an important need for robust development guidelines and the requirement for spaces to be maximised in LDPs, to ensure consistency across all councils and result in the largest area possible being identified for renewable development.

NIE Networks is advocating that consideration be given to the merit of a central process for identifying areas for renewable energy development, to provide consistency and a holistic approach across all council boundary areas. A Northern Ireland wide process involving key stakeholders such as DfI, DfE, NIE Networks and SONI to identify the best areas for renewable development would be beneficial and welcomed. In addition to this, a central process would negate the potential issue where a renewable project and associated grid infrastructure required to connect that project (underground/overhead cables, towers and substations) spans across multiple council areas, where there are different approaches that could lead to conflicts and difficulties.

The benefit to a project being in an area identified in the LDP as an appropriate area for renewable energy development is not clear from the consultation. If a renewable project is in an area identified in the LDP, is it viewed more favourably in the planning process for example more assurance of approval or a shorter timeline waiting for a decision? And is the opposite true for renewable projects that are not within areas identified within the LDP?

NIE Networks would like to highlight the benefits available if strategic renewable energy projects were identified as such through the planning process. This would enable NIE Networks to prioritise the connection of these projects (based on existing legislation) in terms of capacity and timelines in order to most efficiently use the available network capacity in a way that will maximise the likelihood of Northern Ireland achieving the 2030 renewable energy targets. Efficient utilisation of existing infrastructure/capacity and space can have an enormous impact on achieving 2030 and 2050 targets.

NIE Networks would also note that within the Offshore Renewable Energy Action Plan (OREAP) there is an action relating to creating a Memorandum of Understanding (MoU) between DfI/DAERA/DfE to ensure that offshore projects are prioritised. This MoU is important for projects of this nature that are of strategic importance to ensure they are prioritised, particularly through the planning process.

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<sup>1</sup> <https://www.nienetworks.co.uk/statementofcharges>

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NIE Networks believe that this MoU should consider a framework for identifying ‘Strategically Important Projects’ for delivery of the NI Energy Strategy for both onshore & offshore. There is significant development still required onshore to reach Energy Strategy targets, including transmission and distribution grid infrastructure and reinforcement projects and any streamlining that can be gained through this MoU should be equally applied to onshore projects.

**Q3: Do you agree with the draft revised policy approach to provide a presumption in favour of re-powering, extending and expanding solar and wind farm developments, where appropriate? If not, please explain how the draft policy can be improved.**

NIE Networks would like to highlight the impact on the electricity network when a site opts to re-power, extend or expand, and therefore to enable a holistic view to be taken of the associated planning application, NIE Networks should be automatically included as a consultee for re-powering, extending or expanding solar or wind farm developments.

Renewable generation sites that opt to re-power are likely to require new/upgraded electricity connections. Developers will want to maximise the site, for example by installing bigger turbines, and there are new technical requirements that these connections must meet in order to maintain system security and stability with high levels of dispersed renewable generation connected. These things combined will likely require new/upgraded electricity connections and possibly reinforcement of the existing grid infrastructure including overhead lines, underground cables, substations, towers and associated equipment.

**Q4: Do you consider that the draft revised policy provides an appropriate regional strategic planning policy framework for plan-making and decision-taking for all forms of renewable and low carbon energy development? If not, please explain how the draft policy can be improved.**

As noted in the consultation, connection to the distribution network in Northern Ireland will require the renewable generation owner to engage with NIE Networks and follow an established connections process, which will vary based on the size of the renewable generation project. When issuing terms to connect to the network, NIE Networks is obligated to offer the Least Cost Technically Acceptable (LCTA) connection (with specific exceptions). The requirement in paragraph 1.27 that new power lines should be laid underground to reduce visual impact, conflicts with this LCTA principle both in terms of cost and the technical ability in all cases.

NIE Networks would also like to highlight that depending on the size and location of renewable generation or battery storage projects, there will be the need for local works required to facilitate the connection to the existing grid, but there is also the potential for additional works needed on the existing grid in terms of reinforcement if the existing grid infrastructure does not have the available capacity to connect the additional connection. Consideration as to the treatment of grid infrastructure that falls within the areas identified within the LDPs is essential to form a complete view of the overall development needed to facilitate these renewable generation and battery storage projects.

**<http://consultations2.nidirect.gov.uk/dfi-1/revised-regional-strategic-planning-policy/>**



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