Department of the Environment
www.doeni.gov.uk

Angus Kerr
Director
Planning Policy Division

Causeway Exchange
Level 4
1-7 Bedford Street
Town Parks
Belfast
BT2 7EG

Telephone: (028) 9082 3323

Email: angus.kerr@doeni.gov.uk
julie.maroadi@doeni.gov.uk

Renewable Electricity Branch
Department of Enterprise
Trade and Investment
Netherleigh
Massey Avenue
BELFAST
BT4 2JP

15 October 2015

Dear Sir/Madam

Department of the Environment response to the Department of Enterprise, Trade and Investment Consultation Paper 'Closure of the Northern Ireland Renewables Obligation to new onshore wind in 2016'

Consultation proposal: 'Given the UK Government's stance not to socialise costs for new onshore wind beyond 31 March 2016 for ineligible projects and concerns about any additional cost on NI consumers, it is proposed that NI follows the GB position by closing the NIRO to new onshore wind from 1 April 2016. This would apply to onshore wind projects of all sizes.'

Consultation question: 'Do you have any comments on the proposed eligibility and evidence criteria for grace periods?'

1. The Department of the Environment considers that the early closure of the Northern Ireland Renewables Obligation for onshore wind energy development from the 1 April 2016 will have serious environmental and economic implications for renewable energy generation in Northern Ireland.

2. Closure of the NIRO will have a significant impact on the achievement of the Northern Ireland Programme for Government target of a 35% reduction in Green House Gas emissions by 2025, from 1990 baselines. This target was set by including the achievement of 40% of energy from renewable resources by 2020.

3. Northern Ireland is currently producing 20% of energy from renewable energy resources, the vast majority of which is from onshore wind developments. Closure of the NIRO to onshore wind development from 1 April 2016 will have a significant impact on progress towards achievement of the 40% target.

4. Northern Ireland GHG emissions in 2013 were 22.4 MtCO2e, a reduction of 4.3 MtCO2e (16.1%) since the base year 1990. GHG emissions from energy supply are 18.1% of the total NI GHG emissions. In the same period, 1990 to 2013, emissions from energy supply reduced by 1.3 MtCO2e (23.9%), equating to 30.2% of the overall reduction in GHG emissions.

5. The latest projections to 2025, estimate that GHG emissions are on course to reduce by 33.3%. The calculation of this projection includes the 40% of energy from renewable resources by 2020 target. If, for example, the current level achieved of 20% of energy from renewable resources was to be maintained to 2025 the projections would be revised down to 30.5%. Taking the scenario of 30% of energy from renewable sources through to 2025 would revise the projected emissions reduction for 2025 down to 31.9%.

6. The Department is also concerned at the cut off date for the proposed eligibility and evidence criteria to meet proposed grace periods. In order to be eligible for the early closure grace period cluster connected projects will have to demonstrate, inter alia, that they have the relevant planning permission, dated no later than the 30 October 2015.

7. Potentially acceptable renewable energy proposals currently in the planning system may not have sufficient time to secure planning permission either through the Department or through councils which now deal with the majority of applications for wind energy development, in order to avail of the NIRO. This is all in the context of a relatively new two-tier planning system which has only been operational since the 1 April this year.

8. Planning authorities will be under considerable pressure to determine applications in relatively short timescales. Some proposals could be rendered unviable and this will inevitably result in a significant reduction in the number of renewable energy projects coming forward in future, as well as a considerable fall in the associated economic benefits wind energy brings. However, DoE Planning will continue to provide a strategic planning policy context which supports sustainable renewable energy projects in NI.

9. Furthermore, it is noted that the eligibility date for non-cluster connection projects is the consultation period opening date i.e. 30 September 2015. The Department is disappointed that UK Department of Energy and Climate Change (DECC) Ministers have rejected proposals to have the same eligibility date as cluster connected projects. The Department considers that this will compound both the economic implications of the early closure of the NIRO and NI's ability to meet future greenhouse gas emission targets and contribute to wider decarbonisation targets.

Yours faithfully

ANGUS KERR
Director of Planning Policy Division