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14 October 2015

Response to DETI consultation on Closure of the NIRO to new onshore wind in 2016

Canavan Associates are an established N.I. company of town planners and environmental consultants who work throughout N. Ireland in environmental and planning work for the renewable industry. This industry has been vital in sustaining our company providing employment, business and training opportunities for many of our staff and those contracted.

Canavan Associates welcomes the opportunity to respond to this important consultation. We support the NIRIG response to this consultation. In particular, we would like to highlight the following:

- We urge DETI and the Assembly to enact as quickly as possible the proposals outlined within this consultation by approving the NIRO Closure order rapidly and progressing the further steps to enactment without delay. Enactment of the NIRO Closure Order is a pre-requisite for financial close for these projects. In order to qualify for and build out projects within the proposed grace periods members projects will be required to reach financial close within a very short time-frame.

- Given the emphasis on aligning this policy with GB, if there are any positive changes made to eligibility criteria or grace periods in GB as the Energy Bill moves to Royal Assent, then the NI Closure Order should be amended to reflect these positive changes. For example, we note the 9 month investment freeze provisions contained in the GB Bill and we request that a similar measure be included in the NI statutory instrument in due course. We also note the provisions that projects in planning appeal or that should have received a planning determination remain eligible once they receive positive planning decisions and request that this is mirrored in NI.

- There should not, however, be any changes made to NI legislation, once passed, that could have a detrimental impact upon the renewable energy industry in Northern Ireland.

- Northern Ireland projects have all been impacted by the regulatory uncertainty relating to the closure of NIRO. The financial close for certain projects will be delayed until there is legislative certainty and this delay will impact on the capability of these projects in achieving NIRO accreditation

- We also request that DETI quickly acts to provide a route to market for large- and small-scale renewables projects post-2016 to ensure continued investment in this sector. Support mechanism options such as a small-scale FiT and all-island large-scale support schemes should be considered as options

Should you have any questions on the above, please do not hesitate to contact me.

Yours sincerely,

canavan associates

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Seamus Canavan, Director Managing

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