Department of the Environment
Planning Policy Division
3rd Floor, Millennium House
17-25 Great Victoria Street
Belfast
BT2 7BN

14th November 2011

The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2012, Consultation, September 2011

Dear [Name],

The Northern Ireland Renewables Industry Group (NIRIG) is a joint collaboration between the Irish Wind Energy Association (IWEA) and RenewableUK. NIRIG represents the views of the large scale and small scale Renewable Energy Industry in Northern Ireland, providing a conduit for knowledge exchange, policy development support and consensus on best practice between all stakeholders in renewable energy.

NIRIG welcomes the opportunity to comment on the Department of the Environment, Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2012, Consultation document.

NIRIG firmly recognises the importance of protection of our natural heritage, and as part of the Environmental Impact Assessment process wind farm developers already consider this commitment in pursuing wind farm development, both individually and cumulatively with other applications.
The Baker Judgement (Changes or extensions to existing development)

Q1. Do you agree that applying the existing Schedule 2(13) (a) (ii) thresholds to Schedule 1 development as changed or extended will always trigger the threshold and hence require screening?

NIRIG has no comment on the proposed amended screening process. We would emphasise however that an EIA process triggered by an extension /change to a development (Schedule 1 or Schedule 2 development) should not alter the original planning permission where previously assessed and authorised. NIRIG must stress the importance that the planning status of currently approved projects has in securing finance investment for renewable energy projects.

Q2. Do you agree that, in light of the Baker judgement, all changes or extensions to Schedule 1 development should be screened for any likely significant effects on the environment?

NIRIG would agree.

Preparation and content of an Environmental Statement (changes or extensions)

Q3. Do you agree that no changes are needed to Schedules 3 and 4 of the 1999 EIA Regulations?

NIRIG would agree.

The Mellor Judgement – Reasons for negative screening decisions

Q4. Do you have any comments on draft regulation 7(9) as set out in Annex B of this paper?

NIRIG would agree.
Publicity

Q5. Do you have any comments on the proposed changes to the publicity arrangements (draft regulation 19 at Annex D of this paper)?

NIRIG welcomes the changes to multi-stage consents, which remove the requirement for public consultation regarding the environmental statement at each stage of the process.

Proposed amendments to Regulations – Miscellaneous Changes

Q6. Do you have any comments on the proposed amendments to Schedules 1 and 2 of the 1999 EIA Regulations?

No comments.

Q7. Do you have any comments on the Equality Impact Screening Assessment (at Annex F of this paper)?

No comments.

Q8. Do you have any comments on the Partial Regulatory Impact Assessment (at Annex G of this paper)?

No comments.

As highlighted in the consultation paper, the European Commission is currently undertaking a review of the application and effectiveness of the EIA Directive. NIRIG looks forward to participating in any consultation process associated with the implementation of this review where required in Northern Ireland Environmental Impact Assessment legislation.
Please do not hesitate to contact me if you require any further information or clarification on the points detailed in this response.

Yours sincerely

[Name]
Policy and Communications Coordinator

Northern Ireland Renewables Industry Group

[Contact information]