

PLANNING POLICY STATEMENT 18 'RENEWABLE ENERGY'

SUMMARY OF CONSULTATION RESPONSES

Introduction

- 1 On 23 November 2007 the Department issued Draft Planning Policy Statement (PPS) 18 'Renewable Energy' for public consultation. The draft PPS sets out the planning policy governing development that generates energy from renewable sources and incorporates policy provisions on the application of Passive Solar Design (PSD) in new development.
- 2 The Department sent out copies of the Draft PPS to approximately 350 interested parties, including district councils, a wide range of public bodies, MLAs, non-governmental organisations, professional bodies and business interests. Notice of the publication of draft PPS 18 and the commencement of the consultation period was given in the Irish News, Newsletter and Belfast Telegraph on Friday 23 November 2007.
- 3 As part of the consultation process copies of the draft PPS were distributed to Assembly Members; all 26 District Councils, Government Departments and external stakeholders. Notice of the publication of draft PPS 18 and the commencement of the consultation period was given in the Irish News, Newsletter and Belfast Telegraph on Friday 23 November 2007. The document was also made available on the Planning Service website. Consultation responses were requested by 21 March 2008.
- 4 The Northern Ireland Assembly Committee for the Environment was briefed on the draft PPS on 21 March and again on 17 April 2008. In response to a request from the Committee it was agreed to extend the end date for receipt of representations on the treatment of wind energy in the PPS to coincide with end of the public consultation on the related SPG on Wind Energy Development in Northern Ireland's Landscapes on 5 June 2008.
- 5 This report provides an overview of the findings of the consultation process. It is not intended to be a comprehensive report on every comment received, but rather a summary of the key issues raised in the responses. A copy of the responses is available to view on the Planning Service website www.planningni.gov.uk.

Overview of Consultation

- 6 The Department received a total of 90 responses to the draft PPS from a wide range of interests which can be broken down into the following categories:

District Councils	8
Government Departments, Statutory Agencies and Other Public Bodies	12
Professional Bodies and Trade Associations	16
Planning Consultants	3
Responses from individuals	28
Developers	2
Responses from Renewable Energy companies	10
Voluntary Organisations and Charities (including Environmental NGO's)	11

- 7 Most of the responses covered a number of issues and many were very detailed. All of the responses received were taken into account in reviewing the draft PPS. A full list of all respondents is provided in Annex A.

General issues emerging from the response

- 8 The majority of responses welcomed the new policy provisions which encourage the development of renewable electricity and heat generating facilities in appropriate locations in Northern Ireland.
- 9 Some respondents considered that the policy aims and objectives established a general presumption in favour of renewable energy development across the Region which they judged to be inappropriate in natural or semi-natural environments. Several respondents felt that it was inappropriate to establish a presumption in favour of wind energy development as this was viewed as having a potentially damaging effect upon landscape character as well as residential amenity.
- 10 In contrast, some respondents felt that the PPS could have been more radical in promoting the uptake of renewable energy development. The majority however took the view that the policies outlined in the draft PPS were broadly appropriate.

Response:

PPS 18 sets out updated planning policy for proposals to develop renewable sources of electricity generation and heat production.

Its primary aim is to encourage and facilitate the provision and siting of renewable energy generating facilities in appropriate locations within the built and natural environment. It also aims to assist the diversification of energy supply; help develop a more competitive energy market; and encourage economic growth and rural diversification associated with the development of an indigenous

renewable energy industry.

The policy has an important role to play in contributing the achievement of the ambitious Regional targets that 40% of electricity generation should be from renewable energy sources by 2025.

The Department considers that the promotive nature of the policy is justified given the ambitious Regional target for renewable energy. The Department is satisfied that the criteria set out in the policy will ensure that inappropriate renewable energy development is avoided.

Single policy approach

- 11 A number of respondents expressed concerns that a 'single policy' approach to the control of Renewables Energy development would be insufficiently flexible to deal with the range of renewable energy technologies that may come forward for consideration. These respondents felt that a range of bespoke policies would ensure a more appropriate level of control over the particular planning issues raised by different types of renewable energy proposals.

Response:

The Department, in bringing forward the draft PPS 18, did consider the potential for providing a number of bespoke planning policies to deal with the full range of renewable energy developments that are likely to come forward for consideration. Following careful consideration of the matter it was decided that a single policy approach was simpler to apply and most effective.

In practice, different types of renewable energy technologies will raise broadly similar planning issues which can be successfully dealt with by way of a single policy approach. For example issues of visual amenity, landscape character and residential amenity are material planning considerations for wind energy development as well as proposals for biomass or energy from waste plant. Separate planning policies would therefore involve an unnecessary degree of duplication.

PPS wording & terminology

- 12 Some respondents made the observation that the wording of the policy was vague and would fail to give confidence to the renewable energy sector and public alike. For example, some respondents queried how the concepts of 'unacceptable' visual impact or 'significant' harm to amenity could be understood or have meaning in the absence of a definition from the Department on what constituted unacceptable or significant impact or harm. In addition some comments were made about the different terminologies employed.

Response:

The assessment of whether a proposal would result in unacceptable impact upon visual amenity or landscape character requires the application of professional planning judgement. It is not possible for a policy to anticipate and pre-determine all the circumstances where unacceptable or significant impact or harm will be judged to have occurred. This can only be determined by examining and weighing up all of the considerations which are material to a particular case. This means that the policy cannot define all of the circumstances where unacceptable visual impact or significant harm to amenity will be judged to occur.

Energy from Waste

- 13 There were a large number of standardised responses relating to the proposal to site a chicken litter MBT plant at Glenavy in Co Antrim. There were also a significant number of representations from the waste industry. Some of these responses argued that all energy from waste should be regarded as renewable as this was considered to be a sustainable use of this waste resource. Conversely some respondents did not accept that energy from waste could ever be regarded as renewable energy. Others recognised that the biogenic fraction of waste was a source of renewable energy but expressed a strong preference for the use of advanced technologies such as gasification and pyrolysis to exploit this energy source. Other responses, felt that all options, including incineration of waste, should remain open for consideration.

Response:

The Department notes the differing opinions on this matter but has nevertheless maintained its position that only the biogenic fraction of waste can be regarded as a source of renewable energy. The position adopted by the Department accords with that of the Department of Enterprise, Trade and Investment. For combustion technologies the biodegradable fraction of MSW, comprising items such as garden refuse, certain wood waste, and domestic waste paper can be classed as renewable provided that at least 90% of the fuel is biodegradable.

Community Benefits

- 14 While there was a general agreement to encourage the use of community benefits outside of the planning process, some respondents felt that the Department should go further than simply encouraging the use of community benefits, arguing that the discussion and agreement of community benefits or goodwill payments should actually form part of the planning process.

Response:

The Department is of the view that developer offers of community benefits should remain voluntary and outside of the planning process. The wider issue of community benefits is being taken forward as part of the planning reform programme.

Specific Issues Emerging from the Responses

Policy context

- 15 Some respondents expressed concern with the requirement in the Sustainable Development Strategy that at least 25% of the 40% target for indigenous renewable energy generation should be delivered from non-wind technologies. This requirement was viewed as placing an unwarranted restriction upon wind energy which, it was considered, remains best placed to make a substantial contribution to renewable energy and greenhouse gas emission targets
- 16 Most respondents found the policy context to be useful in setting the overall context within which the planning policy will operate. Representations from the waste industry felt that the context could have been framed more widely to include, for instance, reference to strategies such as the Northern Ireland Waste Management Strategy and the Waste Management Plans produced by Local Government. This, it was felt, would recognise the linkages that exist between energy policy and waste management policy.
- 17 Finally, some respondents felt that the section would benefit from further updating to reflect recent developments in this area, such as the proposals for a Directive of the European Parliament on the Promotion of Energy from Renewable Sources.

Response:

The Department is content that the policy context adequately addresses the main international, national and regional policy targets and commitments that are directly relevant to draft PPS 18. The section has nevertheless been updated to reflect recent developments in this area, such as the proposal for a draft Directive of the European Parliament and Council on the Promotion of the use of Energy from Renewable Sources.

Objections which have been raised in respect of targets or objectives contained within other strategies are outwith the scope of the document and this public consultation and therefore cannot be considered.

Policy Objectives

- 18 The Department welcomes the broad support for the primary aim of the PPS to encourage and facilitate the provision and siting of renewable energy and heat generating facilities in appropriate locations within the built and natural environment. There was also general support for the main objectives behind the policies.
- 19 Some respondents commented that the policy aims and objectives established a general presumption in favour of renewable energy development across the Region. They deemed this inappropriate in natural or semi-natural environments. Other respondents felt that it was inappropriate to establish a presumption in favour of wind energy development as this was viewed as having a potentially damaging effect upon landscape character as well as residential amenity.

Response:

The overall objective of the PPS is to encourage the development of renewable energy in appropriate locations in Northern Ireland and contribute to the current regional targets for renewable energy generation in Northern Ireland. To help achieve these targets it is necessary for a promotive policy to apply across the Region, including in natural and environments and in upland areas (as well as those designated as Areas of Outstanding Natural Beauty).

The Department is confident that the safeguards built into the policy and the detailed advice and guidance contained in the complementary landscape sensitive guide will ensure that development is guided to appropriate locations only.

- 20 Several responses suggested that the regional target of sourcing 12% of electricity generation from renewable energy sources by 2015 and 40% beyond 2025 should be confirmed as minimum targets and not, as was feared, a cap upon generating capacity from renewable sources.

Response:

Objections or requests for clarification raised in respect of targets or objectives contained within other strategies or policy documents are outwith the terms of draft PPS 18. As indicated earlier the Sustainable Development Strategy (SDS) does not preclude the renewable energy development in excess of these targets.

- 21 Some respondents expressed concern regarding the objective of promoting greater application of the principles of Passive Solar Design (PSD). This concern was borne out of the understanding that matters

relating to the energy efficiency of buildings are best considered by Building Control using the powers available to them under the Building Regulations. This issue is addressed later in this summary.

- 22 One respondent suggested that the policy should include reference to security of energy supply as an objective given that UK's increasing dependence Northern Ireland's dependence upon imported fuel and energy.

Response:

The Department has amended the text of the final PPS to include the promotion of security of energy supply as a stated objective of the policy.

- 23 The objective to foster greater community involvement in renewable energy projects and encourage the use of community benefits was broadly welcomed by most respondents. Some respondents expressed a desire to know what practical steps could be taken to encourage community engagement or support the provision of community benefits. Others recommended that planning service should have a formal role in negotiating and securing community benefits to ensure that benefits are appropriate, proportionate, fair and consistent. This issue is dealt with in greater detail later in this summary document.

Planning Policy RE1 – Renewable Energy Development

- 24 Most respondents welcomed the general approach adopted by the policy. However, several respondents raised detailed issues concerning how the policy was structured and the type of terminology it adopted.
- 25 Some respondents felt that the wording of the policy was unclear and repetitious, especially in relation to the requirement for environmental information and the difference between EIA and non-EIA development. Respondents felt that the ordering of some paragraphs caused uncertainty as to which policy provisions applied to development requiring Appropriate Assessment under the Conservation (Natural Habitat) Regulations (NI) 1995.
- 26 A number of respondents supported the decision to include specific wind energy development criteria within the policy text of RE1. Conversely other respondents were reassured that additional criteria had been applied to wind energy because they regard the technology as potentially harmful to the visual amenity and landscape character of upland areas; as well as threatening to the living conditions of local residents.
- 27 Other respondents, particularly from the wind industry, felt that it was inappropriate to single out wind energy development as they felt that

this implied that the technology was considered to be problematical and in need of further restraint. A number of others commented that by placing extra emphasis on wind energy the policy was in danger of disregarding or playing down the contribution that other non-wind renewable technologies might make to meeting Government targets.

Response:

The Department has reworded and re-ordered the policy text to provide greater clarity in relation to the requirements for environmental information for Environmental Impact Assessment (EIA) development and non- EIA development alike and also to clarify the policy position in respect of developments that require 'Appropriate Assessment' under the Habitat Regulations.

The Department remains of the view that it is appropriate to provide additional criteria in respect of wind energy development. This form of renewable energy has to date contributed significantly to Government renewable energy targets. It is anticipated that it will continue to make a sizeable contribution toward these targets in the future. At present there are a large number of proposals for wind energy development which are under consideration by Planning Service. It is therefore appropriate to include specific criteria for wind energy development due to the significance of the technology.

The decision to include specific criteria for wind energy development is not an endorsement of this technology above other Renewable energy technologies. It instead recognises the established nature of wind energy and the substantial contribution it is expected to continue to make toward achieving Government targets on renewable energy.

The inclusion of specific measures on wind energy is also recognition of the unique issues associated with large scale wind energy development.

- 28 Several respondents expressed concerns that the policy failed to take adequate account of the amenity of residents living near renewable energy proposals. Some felt that the policy requirement that development should not cause harm to the amenity of any 'regularly occupied' building offered insufficient protection to the amenity of, for example, holiday homes or other buildings occupied on an irregular basis. Some respondents felt that it would be appropriate for the policy to refer to 'sensitive receptors' rather than regularly occupied buildings. These could then be defined to include buildings that may be occupied on a seasonal or infrequent basis.
- 29 Respondents also felt that when assessing the cumulative impact of proposals for wind energy development, Planning Service should be

able to consider the impact of proposals currently under consideration as well as extant approvals and constructed wind farms.

- 30 Some respondents felt it would be desirable for a minimum separation distance between wind energy development and dwellings. It was considered that this would provide assistance to renewable energy developers in identifying potentially suitable sites for wind energy development proposals as well as providing more certainty to the public.

Response:

The Department has amended the draft policy so to require developers to demonstrate that their proposal would not cause significant harm to the safety of any 'sensitive receptor' which has been defined in the policy as 'habitable residential accommodation (not necessarily occupied), hospitals, schools and churches'.

The policy wording has also been clarified to make clear that, when assessing cumulative impact of wind farm development, the likely impact of as yet undetermined planning applications should form part of the assessment alongside those which have been constructed and those which are the subject of extant planning approvals.

In response to points raised through the public consultation, the Department has decided to amend the policy text to include reference to a recommended separation distance that should be applied as a general rule to applications for wind energy development. The distance is expressed as 10 times rotor diameter or a minimum distance of 500 metres to occupied property.

- 31 Some respondents expressed concern over the requirement in the policy that proposals for renewable energy development should state how much energy that are anticipated to generate. They argued that all renewable energy development, regardless of size, has a valuable contribution to make to meeting Government targets and should be encouraged.
- 32 Other respondents requested that the Department provide a definition of what constitutes a 'large scale renewable energy project' for the purposes of the policy.

Response:

The Department has amended the text of the policy to remove reference to a requirement to provide data on the amount of energy a project is expected to generate. It is anticipated that this information

will be provided voluntarily or as part of the environmental information required for larger scale EIA development.

In response to the public responses, the Department has amended the policy to define what constitutes a large scale renewable energy project. This is defined generally in the policy as any project providing 2MW of generating capacity or above. This is intended to complement the provisions of the Electricity (Northern Ireland) Order 1992.

- 33 Some respondents, especially those from the renewable industry, expressed concern that the Policy RE1 only appeared to require the decommissioning of wind energy development. It was considered that the process of decommissioning ought to apply to all forms of renewable energy development which are no longer required or have reached the end of their operational life. The use of conditions to secure future decommissioning of large scale renewable energy development was also raised as an issue that required further clarification.

Response

The Department accepts the comments received in relation to these matters and has amended the policy and the amplification text to make clear that the requirement for decommissioning applies to all renewable energy development and not just wind turbines. The justification text has also been amended to provide additional clarity on the question of how decommissioning and site restoration will be secured.

- 34 The issue of the transmission lines necessary to serve renewable energy development received significant attention. Some respondents felt that it was inappropriate for the policy to require developers to provide details of the likely route of transmission lines as part of the planning application for renewable energy development. This is because the detailed route is not usually available to developers at the time of seeking planning permission. Respondents were also mindful that any transmission infrastructure is itself subject to a separate planning application, frequently by a separate body. Some respondents felt that in this context it was unreasonable to require this information to be presented at the time of seeking planning permission for the electricity generating infrastructure. They felt that the Department should give consideration to removing the requirement.
- 35 Some respondents also questioned why it appeared that the requirement applied only to wind energy development. Others felt that the Department should, as a minimum, provide clarification that the details of transmission line routes will be treated as indicative only, and that any subsequent revision to the routing of power lines will not be

held to invalidate a planning application for renewable energy development.

Response:

The policy requirement that applicants include details of the route and method of connection to the electricity grid was intended to provide an indication of the likely route of transmission lines. The Department accepts that it is not appropriate to require developers to provide detailed and binding information on the route of transmission lines as part of an application for renewable energy development especially since this infrastructure is subject to a separate planning application, often by another body.

In the Departments view it remains important that the applicant should demonstrate that consideration has been given to the question of how the electricity generated by a proposal will be delivered via the transmission network to an end user. It is therefore considered reasonable that the application should provide an indication of the likely route of transmission infrastructure and method of connection to allow for an assessment of the total impact of the development.

The policy text has been re-ordered to make clear that the requirement to indicate the anticipated method of connection to the electricity network applies to all proposals for large scale renewable energy developments.

- 36 Some respondents expressed concern over that the requirement that new wind energy development should not impact significantly on peatland carbon stores. They felt that this requirement was unduly burdensome and threatened to restrict wind energy development in upland areas where peatland habitats predominate.
- 37 Representatives of the wind industry sought clarification of the evidential basis for including such a requirement. Others expressed concerns over whether Planning Service consultees possessed the necessary expertise to properly assess when peatland carbon stores were adversely impacted by new development.

Response:

The Department acknowledges that active peatland is deemed to be a priority habitat and is therefore already protected under the provisions of the Conservation (Natural Habitats etc) Regulations (Northern Ireland) 1995. However, the Department is concerned that large scale wind energy development could cause issues with movement of bog. The Department has reconsidered the policy text and amended this section accordingly.

- 38 There was a general welcome for the Departments decision to encourage community involvement and the use of community benefits outside of the planning process. Some respondents felt that the policy wording was not sufficiently robust and that the Department should go further than simply encouraging the use of community benefits, arguing that the discussion and agreement of community benefits or goodwill payments should actually form part of the planning process.

Response:

It is appropriate that the mitigation measures necessary to allow a development to proceed are dealt with through the planning process. However, in accordance with established practice elsewhere in the UK, the provision of unilateral community benefits by a developer outside the planning process cannot, by definition, be governed through the planning process. To do so would raise the prospect of planning permissions being secured on the basis of the unrelated community benefits.

The issue of community benefits is being taken forward through the wider issue of planning reform.

Justification and Amplification to Policy RE1

Natural and Built Heritage Considerations

- 39 The J&A relating to Natural and Built Heritage considerations received significant comment. Some respondents felt that the policy wording did not fully reflect the wording of the tests laid down by Article 6 of the Habitats Directive. This was because the policy wording failed to make it clear that development for which Appropriate Assessment could not identify an adverse effect on the integrity of a site, would nevertheless still need to be subjected to additional tests including the 'no alternative' and 'imperative reasons of public interests tests'.
- 40 Conversely, other respondents felt that the wording of the justification text at paragraph 4.5 amounted to a presumption against renewable energy development in areas of International Nature Conservation Importance, and as such constituted more than just an amplification of the policy text.

Response:

The Department has reconsidered the need to include detailed information on natural and built heritage considerations within the justification and amplification of this policy as the Departments approach to development within international, national and locally designated sites is already contained in the Departments Planning Policy Statement 2 'Planning and Nature Conservation' and Planning Policy Statement 6 'Planning, Archaeology and the Built Heritage'. The justification and amplification has therefore been amended to refer to these PPS's as appropriate.

Peatland Habitats

- 41 The justification and amplification text on peatland habitats received significant attention from respondents. Some queried the Departments evidential basis for active peatland areas as carbon stores. Other respondents requested a definition of 'active peatland'. Some felt that the wording of the justification and amplification was unduly onerous and threatened to seriously restrict the development of wind energy development.

Response:

The text has been amended in line with the changes to the policy text. A justification and amplification text has been further amended to include a definition of active peatland.

Community involvement and Benefits

- 42 The justification text regarding community benefits received significant attention from respondents. As already stated, some respondents felt that the policy text should go further and *require* the provision of community benefits associated with renewable energy development. The view was expressed that planning service should engage directly with developers to secure the provision of community benefits. In this way the Department could ensure that benefits were proportionate, appropriate and fairly distributed.
- 43 Some respondents had difficulty with the distinction in the text between mitigation measures required to allow a development proposal to proceed and community benefits which are separate from the planning process.

Response:

The PPS aims to promote the use of community benefits outside of the planning system. It must be clear that the provision of benefits is

on a purely voluntary basis with no connection to the planning application process and as such it is not considered appropriate for the Department to take an active role in the delivery of any such community benefits derived.

The justification text has also been amended to make clear the distinction between measures required as mitigation under the planning process and unilateral offers of by developers of community benefits outside of the planning process.

- Decommissioning*
- 44 Respondents requested that the reference to decommissioning of wind energy development be broadened to include all forms of renewable energy development. Other respondents requested that the Department should provide further details on how the decommissioning and restoration of redundant sites will be secured.
- 45 Some respondents felt that the paragraph appeared to preclude the possibility of re-equipping (repowering) sites that have reached the end of their operational / design life.

Response:

The Department has amended the amplification text to make clear that decommissioning requirements extend to all forms of large scale renewable energy development. In response to comments the Department has expanded this section to provide further information on the practical measures that the Department will take to secure decommissioning and site restoration, for example through the use of planning conditions and/or planning agreements. The paragraph has also been amended to make clear that decommissioning need not preclude the possibility of re-powering sites to extend their operational life.

Policy RE2 – Integrated Renewable Energy and Passive Solar Design

General Comments

- 46 At least one respondent expressed concern that the policy text did nothing to encourage proposals for the integration of renewable energy technologies in new and existing buildings, instead stating that planning permission would be granted for such proposals where they meet the provisions of policy RE1 and where the technology was appropriate to its location in terms of visual or amenity impacts. Other respondents felt that the policy could have gone further and *required* the integration of renewable energy technologies in all new development.

- 47 Many respondents saw merit in requiring developers to demonstrate what consideration has been given to principles of Passive Solar Design (PSD) in new development. Some respondents felt that this requirement should be extended beyond those development types listed in the policy.
- 48 Some responses did however express concern over the inclusion of policy measures on and passive solar design (PSD). The view was expressed that similar energy efficiency measures were already adequately dealt with under Part F of the Building Regulations. It was felt that Policy RE1 strayed within the remit of the Building Regulations and, by duplicated these provisions, could give rise to confusion and inconsistency in the application of PSD techniques. Respondents also expressed the concern that planning officers may not possess the necessary technical competencies to properly appraise PSD techniques.

Response:

The policy has been amended to state that proposals for the incorporation of renewable energy technologies, including the retrofitting to existing buildings, will be encouraged.

The Department has amended the wording of the policy to meet the concerns raised regarding the relationship with the Building Regulations. In this regard, the policy text has been amended to encourage the application of the principles of PSD, rather than requiring applicants to demonstrate, for specified types of development, what consideration has been given to principles of PSD.

- 49 Other respondents felt that the potential benefits from the application of PSD were likely to be small especially in the Northern Ireland. Some questioned why PSD, as a complimentary technology, warranted special attention in the policy.

Best Practice Guidance (formerly Annex 1)

General Comments

- 50 There was a general support for the inclusion of background information on the various renewable energy technologies to complement the planning policies contained in the PPS.
- 51 There were a large number of detailed issues raised by respondents in relation to the technical information presented in the Annex.
- 52 In addition, some respondents felt that it would be more appropriate to provide the technical information in a separate document rather than as an annex to the policy itself.

- 53 Two of the most significant issues related to the definition of Renewable Energy for the purposes of Energy from Waste (EfW); and the methodology employed for the assessment of noise from wind farms.

The Definition of Renewable Energy

- 54 The definition of Renewable Energy adopted of the purposes of EfW is based upon those developments which are eligible for Northern Ireland Renewable Obligation Certificates (NIROCs). Responses from the local government and waste sectors felt was inappropriate and unduly restrictive of conventional thermal EfW. Comment was made that it was not appropriate to base a definition upon a financial instrument such as the NIROC. Respondents also claimed that conventional EfW was excluded from receiving NIROCs, because it is already financially viable not because it was regarded as non-renewable.

Noise Assessment

- 55 Some respondents expressed concerns regarding the application of the ETSU-R-97 method of noise assessment. At least one respondent felt this method of noise assessment had been discredited and that it offered insufficient protection to the amenity of residents living near to the site of wind energy proposals. Some respondents felt that further amplification was required on the use of this method of assessing the noise effects of wind farms in preference to BS 4142.

Response:

The Department has reviewed all of the detailed responses received in respect of the information presented in the technical annex, and feels that application of the amenity separation distance of 10 rotor diameter to the nearest occupied building will be sufficient to prevent unacceptable noise impacts.

Landscape and Visual Impact

- 56 The statement in the draft Annex that it is important for society at large to accept wind farms as a feature of many areas of the Region attracted comment. Some respondents were very supportive of this statement while others expressed the concern that it appeared to be too supportive of wind energy development no matter what the cost may be in terms of visual or local environmental impact.
- 57 Some respondents welcomed the decision to provide additional guidance addressing the visual impact of wind energy development and its impact upon landscape character. Others respondents expressed fears that the SPG was overly restrictive and that it threatened to undermine the overall positive tone of draft PPS 18.

Response:

Specific issues on landscape and visual impact relating to wind turbine development have been assessed in bringing forward the 'Wind Energy in Northern Ireland's Landscapes – Supplementary Planning Guidance' publication.

ANNEX A

	Respondent
1	Civil Aviation Authority
2	James O'Flaherty
3	Northern Ireland Judicial Appointments Commission
4	Planning Service Policy & Legislation Branch
5	Antrim & district Angling Association
6	PDSM
7	Your Energy
8	Better Energy / Sustainability.ie
9	NIHE
10	Covanta Energy
11	PSNI
12 *	Arc 21 – Initial Response
13	Larne BC
14	RSPB
15	Patricia Prederson
16	Council for Nature Conservation in the Countryside
17	Gaelectric
18	TCI Renewables
19	Antrim BC
20	National Trust
21	BWEA
22	Chief Environmental Health Officers Group (CEHOG)
23	Environmental Services Association
24	Airtricity
25	Northern Wind Power
26	Construction Employers Federation
27	RES
28	RICS
29	Ulster Angling Federation Ltd
30	Gerard Duffy
31	Carmela Duffy
32	WWF
33	RTPI
34	Ross Planning
35	Southern Waste Management Partnership – SWAMP
36	Stephen McConnell
37	Mr James Bell
38	Mr Gerard Bell
39	Ms Susan Bell
40	Mr Gareth Creaney
41	Ms Caitlin Bell
42	Mr Michal Bell
43	Ulster Wildlife Trust
44	Turan Mirza
45	Mr Paul Herd
46	Carvill Group

47	Turley Associates
48	Mr Stephen Hendren
49	GSNI
50	Ms Patricia Moore
51	Mr Paul Bannon
52	Mr Keys
53	IMechE
54	Mr Patrick Cassidy
55	Mr Danny Moore
56	Ms Rosemary Moore
57	Belfast Friends of the Earth
58	Ms Claire McAleer
59	Carrickfergus BC
60	Mr Tom Campbell
61	Mr Paul McMullan
62	Bridget Cottell
63	Lisburn City Council
64	Mr Peter Archdale
65	Ms Grainne Creaney
66	Sustainable Energy Association
67	Tom Elliott MLA
68	Disability Action
69	Northern Ireland Environment Link
70	NILGA
71	Viridian Power & Energy
72	Ballymena Borough Council
73	Ulster Farmers Union UFU
74	Ms Trish Dodd
75	Belfast City Council development Department
76	DETI – Invest NI – NITB
77	Canavan Associates
78	Energy Saving Trust
79	Institute of Public Health in Ireland
80*	ARC 21 – amended response
81	Confederation of European Waste to Energy Plants
82	Friends of the Earth Northern Ireland
83	DETI Building Regulations Unit
84	DETI – Malachy McKernan
85	Newry & Mourne District Council
86	The Fermanagh Trust
87	CTS Projects
88	CIWM
89	Coleraine Borough Council
90	Mr James Connolly
91	Mr Daniel Kane

*Treated as single response

