Response ID ANON-3FHQ-J6WT-W

Submitted to Revised Regional Strategic Planning Policy - Renewable and Low Carbon Energy
Submitted on 2023-06-30 10:09:04

Public Consultation: Give us your views

Introduction

Renewable energy targets

Renewable and Low Carbon Energy

Regional Strategic Objectives

Regional Strategic Policy

Your Details

1 What is your name?

Name:
Joanna Drennan

2 What is your organisation name?

Organisation Name:
Royal Town Planning Institute

3 From the list below, please select the category of respondent most appropriate to you.

Professional bodies

4 What is your email address?

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Consultation Questions

5 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?

No

Please explain how the draft policy can be improved.:

In addition to maximising renewable and low carbon energy generation at all scales, and minimising the carbon impact of other energy generation, the planning system should:
- facilitate the integration of sustainable building design principles in new development;
- optimise the location of new developments to allow for efficient use of resources; and
- optimise energy storage.

Little is said of the location of new development or of sustainable building design principles in the policy, which will be essential if we are to meet targets. The revised policy goes some way to committing the planning system's support for climate action and decarbonisation of the energy sector, but it does not ensure that the planning system can fully play its part in supporting wider government efforts. This requires more investment, more resource, and better working within and between councils, government departments and other relevant bodies, which should be referenced in the policy.

A well-resourced, plan-led, positive planning service offers an established and effective process to support a sustainable future for Northern Ireland (NI). However, the service is under severe pressure and scrutiny, with specialist resources under particular strain. The adequate resourcing of the planning system is a key factor in delivery of renewable energy infrastructure permissions and how NI meets renewable energy targets for climate action.

There are three main opportunities for increasing the impacts of the planning system:

1. Invest in planning as an essential public service. Like any good public service, the planning system requires resources and capacity to deliver outcomes efficiently, effectively, and equitably. Financial support to increase the number of public sector planners employed, funding for specialist knowledge in renewable and low carbon infrastructure, and investing in efficiency-saving digital technologies can help support the shift from a largely reactive, regulatory planning system, to a proactive and strategic planning system.
2. Support capacity-building in planning. Part of the role of the Royal Town Planning Institute as a learned institution is to promote and advance the training and education of planners in all areas of planning, but now there is the need to extend this training and education into areas such as energy. Our planners (across all aspects of planning: local planning authorities, Department for Infrastructure, Planning Appeals Commissioners, and private planning

consultancies) will need to undergo significant training and working with specialists in the energy sector to deal with planning issues that they have never seen before. RTPI Scotland is currently working on a New Ways of Working paper that will cover the upskilling of Scotland's planning sector to facilitate an effective consenting regime for renewable energy infrastructure.
With the ambitious target to be met for NI, there will be significant opportunities for growth in the planning system and, most importantly, whilst we have lots of planning graduates coming through from our two RTPI accredited planning programmes in the University of Ulster and Queen's University Belfast, there is a significant skills gap for this type of work. There is an increased need for knowledge, training, CPD and upskilling for existing planners but also for new graduates. It is also expected the PAC will have new work from appeals or public inquiries. All agencies will need to work with the accredited planning schools more closely to come up with CPD, Post-graduate qualifications and other training courses to prepare our planners for future renewable energy projects that will be coming forward.
3. Provide new models of funding for plan-making. Most planning expenditure is on development management, with the greatest spending cuts in recent years seen in planning policy. This is partly due to increasing statutory obligations on development management, and partly due to the functions of planning which generate revenue. Funding available for non-revenue generating plan-making activities, could be greatly expanded in size and scope to incentivise quality outcomes, joint working, community participation, and climate ambitions.

6 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?

Yes

Please explain how the draft policy can be improved. :

LDPs should seek to realise their area's full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy development.
RTPI NI welcomes the recognition that future Local Development Plans (LDPs) should help to achieve renewable and low carbon energy targets by providing a presumption in favour of development in areas identified in LDPs. LDPs should align with Climate Action Plans. However, this opens up a debate about the cycle of LDPs compared with climate action plans and renewable energy targets, and the speed with which LDPs are coming forward. There is a robust and wide-spread body of evidence which points to the need for speed in taking action on the climate emergency.
A well-resourced, plan-led, positive planning service offers an established and effective process to support a sustainable future for NI. The adequate resourcing of the planning system is a key factor in delivery of LDPs as well as renewable energy infrastructure permissions.
Planners will need skills and resources to ensure they can not only produce LDPs which align with the Council's targets in terms of carbon budgets, biodiversity, renewable energy targets and permissions etc but also monitor performance. This will also require much more interdisciplinary working in Councils between planners and climate change and sustainability officers to ensure alignment and best use of expertise.
Until LDPs are adopted, strategic planning policy would benefit from identifying broad areas which have the capacity to site wind and solar generation. The policy could also set out criteria against which proposals could be assessed. Individual sites should then be assessed on their own merit and factors such as environmental impact and community views be assessed through the planning system.

7 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?

Yes

Please explain how the draft policy can be improved. :

However, technology changes rapidly and different options may need to be considered and utilised in the future. Time-limited consents provide the opportunity to review the site, to renegotiate community and environmental benefits, and to assess what has changed since the initial consent. A time limited consent could be helpful if it is supported by open and transparent discussion between all parties regarding changing issues over the course of the consent, such as re-powering and life extension options. However, we note this relies on collaborative working and effective communication, which we believe could be significantly improved within the NI planning system, due to the challenges outlined above relating to resourcing and skills.

8 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?

No

Please explain how the draft policy can be improved. :

The RTPI's research 'Planning for Smart Energy' (July, 2019) considers 'smart energy' in relation to national planning policy and guidance and the gap between what happens on the ground and the opportunities offered by smart energy, using the south west of England as a study area. It explores how the planning system can take a proactive, forward-looking and positive approach to supporting the UK's transition to a smart energy future. This research found that the planning system has an important role to play in identifying how new development can integrate with existing assets, such as ensuring new developments connect to district heating systems or that electricity storage can be co-located with existing generation assets. Maximising the use of existing assets and the integration of low carbon energy sources with smart technology could significantly reduce the need for new infrastructure, and avoid contentious proposals being hard-fought through the planning system, as well as offering the most cost-efficient solution.
Therefore, there needs to be strategic, whole system energy planning set out in the regional strategic planning policy framework with an emphasis on:
- detailed locally specific evidence, including engaging with the local distribution network operator, housing developers, energy industry and communities, to create a deliverable plan with high levels of local buy-in;
- consideration of energy in every aspect of development, from allocating sites, to masterplanning, to detailed design;
- recognition that an extended plan period is not always commensurate with the pace of change in the renewable and smart energy industry;
- clear locally-specific policies;
- planning for homes and developments that are "smart-energy-ready" i.e. have features that support the addition, at a later date, of smart technologies,

for example low temperature distribution heating such as underfloor heating enabling later connection of a heat pump;
- planning for outcomes rather than specific technologies. For example, setting levels for onsite energy efficiency, rather than requiring a particular technology;
- performance monitoring and improvement policies.