

Forward Planning Team
Mossley Mill
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Newtownabbey
BT36 5QA

By email to: planning@antrimandnewtownabbey.gov.uk

2 December 2019

Dear Forward Planning Team,

**ANTRIM AND NEWTOWNABBEY BOROUGH COUNCIL DRAFT PLAN STRATEGY
COUNTER REPRESENTATION STAGE – SCOTTISHPOWER RENEWABLES
CONSULTATION RESPONSE**

We welcome the opportunity to respond to the Consultation on the Draft Plan Strategy for the Local Development Plan 2030 through the Counter Representation stage.

ScottishPower is a major UK energy company with network, retail and renewable generation interests. It is part of the Iberdrola group, an international utility and the leading wind energy developer worldwide. With over 2GW of operational capacity, our renewables business, ScottishPower Renewables, is helping to drive the Iberdrola Group's ambition of being the Utility of the Future, and is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation.

With over 40 operational windfarms, SPR manage all of our sites through our innovative and world leading Control Centre at Whitelee Windfarm, near Glasgow. Our operational onshore windfarm portfolio has delivered millions in community benefits to those communities neighbouring our windfarms and continues to deliver significant employment and economic benefits, locally and nationally. We have repowered two of our operational windfarms to date, and anticipate a programme of repowering into the future, as we strive to incorporate the most efficient and cost-effective technologies into existing sites, thereby delivering clean, green energy at the lowest cost to consumers, whilst minimising environmental impacts.

SPR is fully committed to Northern Ireland and the development of renewables to achieve ambitious national targets. Across the UK, public support for wind energy is currently sitting at 78%¹ and local authorities such as Antrim and Newtownabbey have the opportunity to be

¹ BEIS Public Attitudes Tracker (Sept 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/844940/BEIS_Public_Attitudes_Tracker_Wave_31_key_findings.pdf

at the forefront of action to respond to the climate emergency through demonstrating unequivocal support for renewable energy deployment.

Through our review of the Draft Plan Strategy Representations, we believe the Council must respond to any negative portrayal of the renewables industry and ensure that the Draft Plan Strategy fully considers the challenges that the local area is likely to face in the future. Critical to this will be ensuring that the final Plan Strategy sets out the LDP vision and strategic planning objectives for the area, with net zero targets and the climate emergency being at the forefront of this vision.

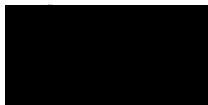
It is our view that to ensure the soundness of the Draft Plan Strategy and subsequent LDP, the Council should do more to establish a positive policy and decision making framework for renewable energy developments across the area. It is evident that the period from 2020 to 2030 will be crucial in minimising and mitigating climate change impacts. By utilising the potential of the renewable energy sector to deliver multiple benefits across the area, in particular through battery storage, solar and onshore wind deployment, the final LDP can ensure that Antrim and Newtownabbey plays a full part in responding to the climate emergency.

The Draft Plan Strategy should contain reference to the positive aspects of renewable developments and contain supportive wording that emphasises the need for balanced consideration of new renewable developments, on a case by case basis, underpinned by policies that contribute to the delivery of Northern Ireland's emission reductions targets. The Draft Plan Strategy should seek to recognise the evolving nature of the industry, including taller, more efficient turbines, improved solar PV technology and utility scale battery storage.

In addition to new renewable deployment, we anticipate a significant programme of repowering onshore wind sites over the coming years. This is required to maintain, and indeed improve, the renewables contribution to date by incorporating the most efficient technologies into existing sites. We welcome the acknowledgement of repowering in the Draft Plan Strategy and the favourable consideration subject to relevant policies, although we would emphasise that landscape and visual considerations should not override the urgent need to deploy a range of renewable technologies on new and existing sites to meet net zero targets and combat climate change.

I hope the comments provided are helpful and please feel free to contact me on 0141 614 3103, or at RFurlong@ScottishPower.com should you require any additional information.

Yours faithfully,



Rachel Furlong
Planning & Environmental Policy Manager