

## **NILGA response to SONI Ltd on “Shaping our Electricity Future”**

**14<sup>th</sup> June 2021**

### **1.0 INTRODUCTION**

NILGA, the Northern Ireland Local Government Association, is the representative body for district councils in Northern Ireland. NILGA represents and promotes the interests of the 11 Northern Ireland district councils and is supported by all main political parties. The Association welcomes the opportunity to participate in the discussion around future energy policies for Northern Ireland, including future of electricity provision and we trust that the views outlined below will be taken into account as policy continues to develop and is finalised.

### **2.0 INITIAL COMMENTS**

NILGA welcomes this consultation as a vitally important part of the consideration of Northern Ireland’s future energy infrastructure provision. This consideration is urgently needed, given the relatively short time left until 2030, and the developing longer term energy policy and strategy which will have an impact for many years to come.

NILGA latterly welcomed the commitment to an Energy Strategy (with ambitious targets and actions for a fair and just transition to net zero carbon) as well as a commitment to a Climate Change Act to give environmental targets a strong legal underpinning, set out within the New Decade, New Approach Deal, and we are keen to see further development of regional policy and strategy on these issues. We are at a crucial point in time for our environment and it is important that we get our infrastructure framework for energy right, as a key priority for the region.

In recent years, the importance of decarbonisation has come to the fore, and it is now vital to make the necessary changes to facilitate the improvements required. We need to enable Northern Ireland to decarbonise and to drive the necessary changes to infrastructure, behaviour and culture to ensure Northern Ireland is resilient to coming challenges, with empowered and carbon literate communities.

### **2.0 SPECIFIC COMMENTS – RESPONSES TO CONSULTATION QUESTIONS**

*'Northern Ireland should do everything possible so that by 2030, at least 70% of its electricity comes from renewable sources like wind turbines or solar panels.'*

**What do you think of this statement?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

***Please include here reasons for your answer, or anything else that gives some context for your views.***

To reduce the likelihood of global temperature rise of more than 1.5°C the UK has committed to reducing its greenhouse gas emissions to net zero by 2050. As part of this the UK Committee on Climate Change has advised DAERA that Northern Ireland should be working to achieve a reduction of at least 82% of greenhouse gas emissions on 1990 levels by 2050.

Tough carbon-specific targets have also been set as part of the UK's sixth carbon budget, requiring a reduction of 68% on 1990 levels by 2030, reducing further to 78% of 1990 levels by 2035. To achieve these, it will be vital for Northern Ireland to decarbonise its electricity infrastructure within the next 9 years, so that 70% of our energy comes from renewables.

Focussed strategic planning and urgent action is now necessary to achieve this. A priority for NILGA members is to ensure that costs are kept manageable for consumers, with fuel poverty already a key issue in Northern Ireland. NILGA is keen to ensure that Northern Ireland has a 'just transition', with the most vulnerable consumers protected. Our members are deeply concerned that costs of change will be passed on to consumers, to garner healthy company profits. Community benefit systems and approaches must be 'designed in' during the planning stage for the approach eventually taken.

**Draft Approach 1: Generation-led**

*'When connecting new sources of renewable electricity, locations should be guided by the strength of the grid and demand for power near the proposed site'.*

**What do you think of this statement?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

***Please include here reasons for your answer, or anything else that gives some context for your views.***

NILGA agrees with this statement for the purposes of this consultation, as a generation led approach will ensure that at least 70% of electricity can be obtained from renewable sources by 2030, however during that time, NILGA would be keen to see development of the strength of the grid in the west of Northern Ireland to support economic development in that area, and to ensure security of supply across the region. We note the already high levels of wind energy in the west due to the geography of the area, and would encourage SONI, Department for Economy and developers to work with the local planning authorities particularly in Derry City & Strabane, Fermanagh & Omagh and Mid Ulster District Councils, to ensure the economic aspirations and infrastructure requirements of those areas can be supported appropriately.

The 2030 target year is merely a 'stopping off' point on the pathway to 2050, and while, over the next 9 years, a generation-led approach may emerge as the preferred option, work must continue on the other identified approaches to meet the emerging aspirations of the evolving Energy Strategy, which is likely to encourage a decentralised approach, demanding much greater versatility than is available at present.

**Draft Approach 2: Developer-led**

*'Companies that develop renewable electricity should decide where to locate new wind or solar farms'.*

***What do you think of this statement?***

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

***Please include here reasons for your answer, or anything else that gives some context for your views.***

NILGA would encourage SONI, Department for Economy and developers to work with the local planning and economic development departments in the 11 councils to ensure the economic aspirations and infrastructure requirements of those areas can be supported appropriately.

Developers can apply for permission for sites where they wish to locate relevant installations, but this will require detailed pre-application discussion with planning authorities, with applications in line with local planning policy e.g. local wind energy strategies.

The consultation infers that a developer-led approach is unlikely to enable NI to meet the necessary 2030 target, with the associated need to more grid infrastructure making this proposition difficult in the 9 year timeframe. NILGA also notes the delays that can be associated with local objections, judicial reviews etc.

However, we have been informed by developers in the industry that they wholeheartedly disagree with this inference; we would therefore encourage SONI to work closely with developers to ensure a constructive collaborative relationship going forward.

**Draft Approach 3: Technology-led**

*'Renewable electricity needs to be moved from remote locations to where most power is used. To achieve this, we should use new technology like high-voltage direct current underground cables.'*

**What do you think of this statement?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

***Please include here reasons for your answer, or anything else that gives some context for your views.***

Renewable technologies are often reliant on particular geographies and need to be in certain places to be viable. There are also issues such as difficulties with noise, which limit how close wind turbines can be to domestic properties. The technical difficulties and high costs associated with installing DC underground cables are noted, but this may become a more viable option in the longer term, with developing technology.

NILGA notes the potential for development of offshore wind farms close to larger population centres both on the east coast and the northwest, i.e. building new installations closer to where more power is used, and would encourage discussions with coastal and fishing communities as a priority. This may also need to include communities on e.g. the Isle of Man.

We have been informed by developers that offshore developments are likely to take much longer, in comparison with onshore wind developments, so if offshore is to be the preferred solution, work to initiate development should commence as soon as possible.

## Draft Approach 4: Demand-led

*'Companies that use a huge amount of power should locate new facilities near sources of renewable electricity and where the grid is strong.'*

***What do you think of this statement?***

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

***Please include here reasons for your answer, or anything else that gives some context for your views.***

NILGA is keen to see a balanced approach to economic development in Northern Ireland, and the development of secure sustainable employment in each of our 11 council areas. Recent experience of home working as a result of the pandemic has caused people to question the 'all roads lead to Belfast' approach to employment and it is likely that even without large employers close to renewable power sources, demand in those areas will increase over the next 9 years. For example, the NI Civil Service is developing a system of employment hubs across Northern Ireland.

A demand-led approach will have substantial planning and economic development implications and although SONI has rightly pointed out that this would require alignment with and support from InvestNI, close collaborative working will also be required with the local councils. We are keenly aware of local government concerns in relation to the suggestion of a demand led approach, and the potential to have an adverse impact on the economy of those Councils which are not located close to the sources of clean energy, for example Armagh City, Banbridge & Craigavon District Council.

The relatively low cost of this approach is noted, as this could provide greater protection to consumers, but it is unknown at present whether sufficient numbers of relevant investors are or will be available by 2030.

## Conclusion

***Do you have any other feedback or is there anything that you feel we have not considered?***

NILGA members would be extremely keen to see a planning-led approach to this work, in collaboration with councils and aligning with other utilities and infrastructure.

The demand and shift into Belfast is changing with different transport needs (Electric vehicles) and people heating their homes differently (air and ground source heat pumps), and this will impact electricity use.

A mix of technologies is going to be vital; NILGA is responding to the Department in relation to the parallel Energy Strategy Policy Options consultation noting the importance of considering anaerobic digestion and other energy from waste opportunities, battery storage, biogas, etc.

NILGA is keen to encourage community energy projects and microgeneration, but we are aware of the complications this could cause for the grid in the short term.

NILGA and our member councils are ready, willing and able to work with SONI Ltd, government, business and the public to begin to meet these challenges, and we look forward to the outcomes of this consultation to better inform and focus effort.

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