

16th March 2011

NIRIG response to the Department of Environment Consultation on the Draft Planning Policy Statement, PPS16 'Tourism'.

The Northern Ireland Renewables Industry Group (NIRIG), a joint collaboration between the Irish Wind Energy Association and Renewable UK, welcomes the opportunity to comment on the Department of Environment Consultation on the Draft Planning Policy Statement, PPS16 'Tourism'. We would like to address the following areas in relation to *TSM 1 Safeguarding of Tourism*:

- 1. Inconsistency with the Department of Regional Development 10 year Regional Development Strategy**
- 2. Wind Farms and Tourism**
- 3. Clarity on Relationship between PPS18 and PPS16**

NIRIG recognises that the Department has a statutory duty, laid down in Article 3 of the Planning (Northern Ireland) Order 1991, to formulate and co-ordinate policy for securing the orderly and consistent development of land and for the planning of that development. We also note that the Department is required to ensure such policy is in general conformity with the Regional Development Strategy.

The Department of Regional Development (DRD) is currently consulting on the 10 Year Regional Development Strategy. In the DRD draft strategy there are many references to the regional development goals for the development of renewable energy and the supportive infrastructure to bring this into the electricity grid.

NIRIG is concerned that the wording of 'TSM 1 Safeguarding of Tourism Assets' is in direct conflict with the Executive Targets and DRD Strategic Goals for the Renewable Energy Sector as set out in the Regional Development Strategy.

Goals and Statements from the DRD Strategy for the next 10 years in relation to this point include, but are not limited to:

- Relevant Executive Targets/Goals: To secure 40% of electricity consumption from renewable sources by 2020.
- The cluster of Coleraine, Ballymoney and Ballycastle is close to the Causeway Coast and Glens, a significant tourist attraction. Renewable energy could also be developed using the natural assets of the area.

- **Strategic Goal 6: Develop a strong North West**

Due to the geographic peripherality of the North West, transport, energy and telecommunication connections are important to the economic and social fabric of the Region. Improve the energy infrastructure across the Region to ensure that the North West, in particular, has access to reliable sustainable energy supplies to support economic growth and connectivity, and to maximise the North West's significant renewable energy resource.

- **Strategic Goal 19: Deliver a sustainable and secure energy supply**

Increase the contribution that renewable energy can make to the overall energy mix. There will need to be a significant increase in all types of renewable electricity installations and renewable heat installations, including a wide range of renewable resources for electricity generation both onshore and offshore.

NIRIG considers the above to be in conflict with TSM 1 Safeguarding of Tourism Assets where it states that "Planning permission will not be granted for development within the visual setting of a tourism asset that would in itself or in combination with existing and approved development in the locality have an adverse impact on its value as a tourism asset."

For the purposes of this statement, a tourism asset is defined as any feature associated with the built or natural environment which is of intrinsic interest to tourists. Interpretation of this statement could conclude that Northern Ireland's

landscapes and historical sites would be ‘out of bounds’ for wind farm development if this policy is implemented.

We recognise that this policy provides for the safeguarding of valuable tourism assets, and furthermore respect the need of DOE to do so. However it is noted that many renewable energy developments and the grid infrastructure required for accessing them will intrinsically impact on the landscape of Northern Ireland. Some landscapes however are considered to be resilient to levels of change. While development will introduce new features to the landscape, the landscape and visual impact assessment (LVIA) carried out as part of an EIA will assess the ability of a landscape to accommodate change. Visibility is largely dependent on a range of site-specific conditions and is a key consideration in the development of a wind farm project and in design of project.

We would add that the interpretation of what a tourism asset is undefined and subjective, even more so is the interpretation of adverse impact on ‘value as a tourism asset’. Much great clarity on the terminology used in PPS16 is required.

2. Wind Farms and Tourism

One of the common myths about wind energy is that the presence of wind turbines in the landscape is a deterrent to tourists. What is true is that a diverse range of factors influence the UK tourist industry, unrelated to wind farm development, and that where studies have been carried out investigating the impact of wind farms on tourism, the results demonstrate that the effect is negligible at worst, with many respondents taking a positive view of wind farms, and saying that it would not affect their likelihood of returning to an area, while a common finding of many other surveys is the public's desire to find out more about wind farms and renewable energy.

We note that there are indeed many diverse features or combinations of features associated with the natural and built heritage in Northern Ireland which are of intrinsic interest to tourists. We reflect that in many parts of Europe there is a thriving tourism trade alongside wind farm developments. In a 2008 Study by the Scottish

Government (Economic Impacts of Wind Farms on Scottish Tourism), three quarters of tourists surveyed for the study into the felt wind farms had a positive or neutral effect on the landscape. Ninety seven percent of tourists in the sample said wind farms would have no impact on their decision to visit Scotland again.

3. Clarity of relationship between PPS18 and PPS16

NIRIG would additionally like the DOE to further consider the relationship of PPS 16 with other Planning Policy Statements at this time. NIRIG is concerned that the potential for perceived conflicts of interest in PPS 16 and PPS 18 could lead to confusion and planning delays for the renewables industry; and industry encouraged by the Executive to meet the 40% Northern Ireland Renewables Target by 2020.

Conclusions

1. NIRIG would make the point that further clarity on such a broad sweep policy needs to be added to limit subjectivity of interpretation.
2. The clear conflict of interests with the DRD Regional Strategy should be addressed with clarity so as to avoid future confusion in the interpretation of Planning Policy at a regional level.
3. NIRIG would ask that the relationship between PPS16 and PPS18 is made clear. Elements of these planning policy statements are in conflict. Which will take precedence? How will Planning Service determine this?

NIRIG would welcome the opportunity to engage with Planning Service on this and other renewables planning issues in the near future.