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19<sup>th</sup> September 2025

*Sent via email to ldp@nmandd.org*

### **Local Development Plan 2035 – Draft Plan Strategy, June 2025**

Dear Sir/Madam,

#### Introduction

ABO Energy Northern Ireland Ltd. (ABO) is part of the ABO Energy group of companies, a globally successful renewable energy developer with c.1,200 employees. Since 1996, the company has developed and built wind and solar farms, as well as battery and hydrogen projects, worldwide. ABO Energy has realised renewable energy plants with a total capacity of around 6GW and has built approximately half of these, with an international development pipeline totalling 31GW.

In NI our core business focuses on the development and construction of onshore wind, solar, and battery energy storage projects. Our commitment to the NI energy sector has been unparalleled in recent years. As one of the most active developers in NI's renewable energy industry, we plan to undertake significant further investment, supported by our access to global experience and expertise.

We welcome the opportunity to engage with Newry, Mourne and Down District Council (NMDDC) as part of the Consultation process regarding the Local Development Plan (LDP) 2025 draft Plan Strategy (dPS) and note our broad support across Strategic Policy RES1 and Operational Policy RE1&2. ABO further support and endorse those comments made in submission by Renewable NI, who are the voice of the renewable energy industry locally. Below are points for clarification or inclusion we deemed critical for review and to ensure the dPS is considered sound.

The following documents should be accounted for in the dPS:

- The Path to Net Zero Energy (Department for Economy, 2021)
- Draft Climate Action Plan 2023 – 2027 (Department of Agriculture, Environment and Rural Affairs, 2025)
- Northern Ireland's Fourth Carbon Budget (Climate Change Committee, 2025)



Prepared as part of the evidence base informing the dPS, Technical Supplement 9 (TS9) – Public Utilities, refers to a draft document published on 6<sup>th</sup> April 2023 within which the share of Northern Ireland's energy coming from renewable sources is noted as 51%. We consider this figure to be outdated (a 2022 statistic) and misleading, given the most recent figures published by Department for the Economy (DfE) indicate for the period July 2024 to June 2025 only 43.1% of renewable energy contributed to our energy mix.

The Technical Supplement also refers to Version 1.0 (November 2021) of the SONI Shaping our Electricity Future (SOEF) Roadmap. This has been superseded by SOEF Version 1.1 (July 2023) which recognises the requirement for 80% renewable electricity generation by 2030, not 70% as currently stated in TS9.

Up-to-date figures should be used and historical references which do not reflect the current situation should be deleted. The current renewable energy contribution figures underscore the urgency for additional large-scale renewable energy projects to be accommodated across Northern Ireland and indeed within the NMDDC area.

#### Strategic Policy RES1 – Renewable and Low Carbon Energy

*"The LDP will play a major role in helping the district continue along the path to achieving net zero by 2050, as required by the Climate Change Act (Northern Ireland) 2022. The district has significant potential for renewable and low carbon energy development. To date this has been in the form of wind energy. While there have been few commercial wind farm developments there have been numerous turbines erected for individual dwellings and farm businesses, especially in rural areas."*

References to the Climate Change Act (Northern Ireland) 2022 are absent, along with reference to the requirement for 80% of electricity to come from renewable energy sources by 2030. The 80% target should be afforded sufficient acknowledgement and weighting in the dPS.

NMDDC occupies roughly a third of the southeast of Northern Ireland, within which SONI assumes 450MW of onshore wind will need to be accommodated (Figure 14 & Table 13 of the SOEF V1.1 Roadmap) to help meet 80% renewables by 2030. NMDDC must recognise this target and seek to contribute and facilitate across the Local Planning Authority jurisdiction. This figure cannot be achieved via small-scale wind energy generation (single turbines), representing just 11.5% (160MW) of the total onshore wind energy currently connected to the system (1,387MW) in Northern Ireland.

The dPS recognises over 55% of the district lies within three Areas of Outstanding Natural Beauty (AONBs), but has not designated areas suitable or unsuitable for renewable energy development. All councils within Northern Ireland must act to facilitate compliance with the Climate Change Act (NI) 2022 requirements for 80% of electricity from renewables by 2030. We consider that the obligation to accommodate renewable energy developments, including for larger forms such as wind energy development, should not be consigned to neighbouring Local Government Districts alone.

#### Policy RE1 – Renewable and Low Carbon Energy

*"The wider environmental, economic and social benefits of all proposals for renewable and low carbon energy projects are material considerations that will be given appropriate weight in determining whether planning permission should be granted."*

Whilst acknowledging this is consistent with Para. 6.225 of the Strategic Planning Policy Statement (SPPS), in the context of a Climate Emergency, as declared by Council in October 2019, the 'appropriate weight' which should be given to renewable energy projects is inherently significant. This is particularly the case



considering the Climate Change Act (NI) 2022 requirements for at least 80% of electricity to be obtained from renewables by 2030. To ensure RE1 is unambiguous, the terminology should explicitly outline that significant weight which should be afforded to renewable and low carbon energy applications.

Before finalisation and adoption of the dPS, consideration should also be given to the yet unpublished revised SPPS – Renewable and Low Carbon Energy. The dPS must ensure consistency with Regional Policy and place greater emphasis on the benefits of renewable and low carbon energy projects in recognition of the Climate Change Act (NI) 2022 requirements. Notably, the draft revised SPPS required:

*"In plan-making and decision-taking, planning authorities must take full account of the above-mentioned aim and targets, the regional strategic objectives and policy provisions, local circumstances, and the wider environmental, economic, and social benefits of renewable and low carbon energy development to local communities and to everyone in Northern Ireland."*

Policy RE1 Renewable and Low Carbon Energy states:

*"A cautious approach will apply within designated landscapes which are of significant value such as Areas of Outstanding Natural Beauty and their wider settings."*

Policies RG5 and RG11 of the Regional Development Strategy (RDS) are somewhat conflicting due to the need to secure sustainable energy supplies, while balancing those benefits against the adverse impacts that may arise. However, it is clear that in order to promote the conservation of local identity, protect and where possible enhance the natural environment, it will be necessary to promote the delivery of renewable energy technologies within such areas. In this regard, it is essential that wind energy developments, amongst all other onshore technologies both existing and developing, are accommodated insofar that the adverse effects arising are offset by the demonstrable of benefits that derive from secure renewable energy sources.

As previously stated, AONB designations already cover over 55% of the NMDDC area so the 'cautious approach' should not be further extended to the 'wider settings' of AONBs. The reference to 'wider settings' is ambiguous, open to misinterpretation and misrepresentation and as such should be deleted. Whilst ABO Energy respects the need for a cautious approach within designated landscapes, the limited availability of sites suited to renewable energy and urgency of the action required to address the climate emergency must be recognised by NMDDC.

Policy RE1 Renewable and Low Carbon Energy states:

*"Proposals will not normally be considered in Special Countryside Areas (SCAs). However, where they are submitted, they will be required to meet the provisions of Policy LA1."*

This statement is superfluous as it is preceded by the statement 'A cautious approach will apply within designated landscapes which are of significant value...' which inherently includes SCAs. All renewable energy proposals submitted to NMDDC must be considered and should be assessed on merit, given the wider environmental, economic and social benefits of renewable and low carbon energy projects are material considerations. These material considerations apply irrespective of project's siting.

Policy RE1 Renewable and Low Carbon Energy states:

*"For all wind turbines a separation distance of 10 times rotor diameter to any sensitive receptor, with a minimum distance of not less than 500m for wind farms (defined as two or more turbines) will generally apply."*



The x10 rotor diameter (RD) guidance should be removed with noise, shadow flicker and residential amenity impacts assessed on a case-by-case basis and conditioned where necessary. A minimum distance of 500m should continue to generally apply for wind farm developments. Application of the x10 RD will become increasingly restrictive as larger, more efficient turbines become available, while smaller turbines are phased out of production. There are no such arbitrary setback distance requirements in Scottish, English, or Welsh planning policy, with decisions based on the assessed impacts on properties.

ABO Energy again welcome the opportunity to engage with NMDDC, helping to shape the next LDP that will remain operational to and beyond key legislative targets set out in achieving 80% by 2030. We trust the points presented are given due consideration throughout the next steps of plan preparation, including independent examination, and look forward to reviewing the draft Local Policies Plan to follow.

Should you have any queries, please do not hesitate to contact our office.

Yours faithfully,

A large black rectangular redaction box covering a signature.

Senior Development Project Manager