

Local Development Plan 2032

Technical Supplement Paper 14

Renewable Energy



**Ards and
North Down**
Borough Council

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1.0 INTRODUCTION

Purpose of this document

- 1.1 This technical supplement is one of a suite of topic-based documents detailing the evidence base used to inform the preparation of the Ards and North Down Local Development Plan (LDP) draft Plan Strategy 2032. This suite of documents should be read alongside the policies contained within the draft Plan Strategy in order to understand the rationale and justification for each policy.
- 1.2 In May 2019, the Council launched the Preferred Options Paper (POP), the first of 3 public consultation documents which will be issued through the LDP process. The POP outlined the vision and strategic objectives of the plan based upon the baseline information detailed in a suite of position papers. The technical supplements which complement the draft Plan Strategy will build upon the baseline information gathered in the position papers and show how this has been progressed through the LDP process to formulate the draft Plan Strategy.
- 1.3 This technical supplement builds upon and updates the renewable energy section of the Public Utilities and Energy Preferred Options Paper position paper, and along with the full suite of technical supplements, topic papers and associated documents, sets out the evidence base that has formulated the renewable energy policies in the draft Plan Strategy.
- 1.4 Public consultation processes and engagement with elected members have also been taken into account. It should be noted that this is based upon the best information available at the time of compiling this position paper. Amendments may be required as new data becomes available or as a result of any changes in policy or guidance.

Planning and Renewable Energy

- 1.5 The United Nations defines renewable energy as 'energy derived from natural sources that are replenished at a higher rate than they are consumed'. Renewable energy sources including sunlight and wind are plentiful and all around us. Traditional forms of energy such as fossil fuels take millions of years to form and when burned to create energy give off harmful greenhouse gases. Therefore, a transition to renewable energy is key to tackling the global climate crisis. Battery storage systems are playing an increasingly important role in the drive towards renewable energy. These storage systems enable renewable energy to be stored and released as needed when the sun isn't shining or the wind isn't blowing.

- 1.6 In December 2021, the Northern Ireland Executive published The Path to Net Zero Energy, Energy Strategy which aims to ensure that our energy is secure, affordable and clean for us now and future generations. As well as the environmental benefits, a transition to renewable energy will also help to address price volatility associated with fossil fuels and ensure that more of the money we spend on energy stays within the local economy creating jobs and wealth.
- 1.7 The planning system is a key mechanism by which the Council can make an important input into the delivery of the NI Executive's objectives. The land use planning system has an important role to play in mitigating and adapting to climate change and supporting the shift towards energy efficiency and renewable energy.

2.0 REGIONAL POLICY CONTEXT

Programme for Government 2024-2027

- 2.1 The Northern Ireland Executive has agreed and consulted upon 'Our Plan: Doing What Matters Most', the Programme for Government (PfG) 2024-2027. The PfG sets out the Executive's priorities for making a difference to people's lives – comprising nine immediate priorities and three long-term missions of people, planet and prosperity, with a cross-cutting commitment to peace. Particularly relevant to renewable energy are the priorities to 'grow a globally competitive and sustainable economy', 'provide more social, affordable and sustainable housing' and 'protecting Lough Neagh and the environment.'

Draft Programme for Government 2016-2021

- 2.2 The previous draft Programme for Government 2016-2021 was the most up to date expression of the highest level of policy from the Northern Ireland Executive during much of the preparation of the draft Plan Strategy. It set out 14 strategic outcomes which the Executive believed best described the society we wish to have. Of particular relevance to renewable energy is the outcome 'we live and work sustainably- protecting the environment'.

The Regional Development Strategy (RDS)

- 2.3 The RDS provides an overarching strategic planning framework to facilitate and guide the public and private sectors. It is not limited to land use but recognises that policies for physical development have far reaching

implications. The RDS addresses economic, social and environmental issues aimed at achieving sustainable development and social cohesion. The Local Development Plan must take account of the RDS.

- 2.4 The vision of the RDS is for “An outward-looking, dynamic and liveable Region with a strong sense of its place in the wider world; a Region of opportunity where people enjoy living and working in a healthy environment which enhances the quality of their lives and where diversity is a source of strength rather than division.”
- 2.5 The RDS highlights that decision makers will have to balance potential adverse environmental effects against the benefits of a secure renewable energy stream and the potential for cleaner air and energy for industry and transportation. Regional guidance contained within the RDS (RG9) aims to ‘reduce our carbon footprint and facilitate mitigation and adaption to climate change whilst improving air quality’. Suggested measures include: more energy efficient forms of transport; improving the energy efficiency and adaptability of buildings; increasing the use of renewable energies; and utilising local production of heat and/or electricity from low or zero carbon.

Strategic Planning Policy Statement

- 2.6 The Strategic Planning Policy Statement (SPPS) was published by the Department of the Environment (DOE) in September 2015. The SPPS clearly specifies sustainable development as one of the core principles of the reformed planning system. According to the SPPS, the planning system should therefore help to mitigate and adapt to climate change by considering the energy and heat requirements of new developments when designating land and making use of and promoting opportunities for energy and power sharing, or for decentralised or low carbon sources of heat and power wherever possible.
- 2.7 The SPPS states that councils should set out policies and proposals in their LDPs that support a diverse range of renewable energy development including the integration of micro-generation and passive solar design. In 2021, the Department for Infrastructure launched a review of strategic planning policy on renewable and low carbon energy. The LDP will be take account of any forthcoming amendments to strategic planning policy throughout the plan process.

[The Northern Ireland Energy Strategy 'Path to Net Zero Energy', Department for the Economy \(2021\)](#)

- 2.8 This Strategy sets a long-term vision of net zero carbon and affordable energy for Northern Ireland. The highest levels of energy efficiency will reduce the amount of energy needed whilst making sure the energy we do use comes from clean renewable sources. The Strategy sets targets to deliver energy savings of 25% from buildings and industry by 2030; and meet at least 70% of electricity consumption from a diverse mix of renewable sources by 2030. The Strategy recognises the economic benefits of clean energy and sets a further target to double the size of our low carbon and renewable energy economy to a turnover of more than £2 billion by 2030.

[Climate Change Act \(Northern Ireland\) 2022](#)

- 2.9 The Climate Change Act sets a target of an at least 100% reduction in net zero greenhouse gas emissions by 2050 (i.e., net zero emissions by 2050) for Northern Ireland, along with interim targets including an at least 48% reduction in net emissions by 2030. The Act also uplifts the target set in the 2021 Energy Strategy by requiring that at least 80% of electricity consumption is to be generated by renewable sources by 2030.

[3.0 Planning Policy Statements and Supplementary Guidance](#)

- 3.1 Planning Policy Statement 18: Renewable Energy sets out the Department's planning policy for development that generates energy from renewable resources and that requires the submission of a planning application. In addition, the PPS encourages the integration of renewable energy technology and greater application of the principles of Passive Solar Design in the design, siting and layout of new development.

[Guidance Documents](#)

- 3.2 The following supplementary planning guidance is also relevant to renewable energy development-
- [Best Practice Guide to PPS 18 'Renewable Energy'](#).
 - [Draft Supplementary Planning Guidance to PPS 18 'Renewable Energy' Anaerobic Digestion](#)
 - [Development Control Advice Note 10- Environmental Impact Assessment](#)
 - [Wind Energy in Northern Ireland's Landscapes](#)
 - [Wind Energy Development in Northern Ireland](#)

4.0 LOCAL POLICY CONTEXT

[The Big Plan for Ards and North Down 2017-2032](#)

- 4.1 The Big Plan is the Community Plan providing an overarching framework setting out a shared vision and ambition that Ards and North Down's Strategic Community Planning Partnership has agreed to work towards over the next 15 years. The vision of the plan is that Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to be.
 - 4.2 The overarching, cross-cutting ambition of The Big Plan is 'To have empowered, resilient individuals and communities, to reduce inequality; to promote good relations and sustainability; and to improve accessibility of all public services.'
 - 4.3 The Big Plan contains five outcomes that the Plan hopes will reflect the position of the borough by 2032. Outcome 4 of the 'Big Plan' is that 'All people in Ards and North Down benefit from a prosperous economy' with an aspiration that everyone in Ards and North Down has access to utility services. Outcome 5 of the 'Big Plan' is 'All people in Ards and North Down feel pride as they have access to a well-managed sustainable environment.' This outcome has an aspiration to manage the physical environment to the benefit of residents.
 - 4.4 Part 2 of the 'Big Plan' was published in April 2022 as a scheduled 4 yearly review. This review highlighted that many of the priorities previously identified such as poverty and mental health were highlighted as the most pressing issues during the previous years exacerbated by the Covid-19 pandemic. Part 2 also recognises that a climate crisis has been declared and that if we do not act urgently, the ability to achieve any of the outcomes of the 'Big Plan' will be severely compromised. Climate action and mitigation actions were added to all community planning workstreams.
 - 4.5 The Local Government Act 2014 through an amendment to Section 8 of the Planning Act (Northern Ireland) 2011 introduced a statutory requirement that the preparation of the LDP must take account of the Community Plan. The Big Plan will work in tandem with the LDP providing the spatial framework to achieve the shared vision for the Borough.
- ### [Ards and North Down Corporate Plan 2024-2028: A Sustainable Borough](#)
- 4.6 The priorities of the corporate plan are closely aligned to those within the Big Plan, the community plan for Ards and North Down, which sets out a long-term vision for Council, local organisations and communities to

work towards. The Corporate Plan aims to see progress towards a sustainable Borough through innovation in services and greater partnerships with residents and other organisations. The plan is driven by three corporate priorities: Economic- increasing growth by attracting more jobs and businesses, Environmental- reducing carbon emissions as we transition to net zero and, Social- improving wellbeing through social inclusion and reducing inequalities.

- 4.7 These corporate priorities are linked to seven outcomes the Council wants to achieve. Of particular relevance to renewable energy is Outcome 2 - An environmentally sustainable and resilient Council and Borough meeting our net zero carbon targets.

[The Integrated Strategy for Tourism, Regeneration and Economic Development 2018-2030 \(Ards and North Down Borough Council\)](#)

- 4.8 The Integrated Strategy presents a vision for the pursuit of prosperity in the Borough of Ards and North Down. The vision of the strategy is translated into tangible actions one of which is to 'nurture our assets'. This includes working to reduce the negative impact of our actions on the environment which have local, as well as global implications. The Strategy proposes 'an ambitious programme to reduce carbon emissions at the local level, contributing to wider regional and national efforts. This will involve the identification and implementation of measures that can demonstrably lower emissions within the Borough.' Target areas are likely to include switching to renewable energy sources where possible.

[Ards and North Down Borough Council Roadmap to Sustainability](#)

- 4.9 In February 2019 Ards and North Down Borough Council passed Northern Ireland's first climate emergency motion. This motion declared a climate emergency and requested an urgent report to assess the impact of the activities of Ards and North Down Borough Council on greenhouse gas emissions, exploring what mitigation measures could be put in place and established a working group to bring the issues of climate breakdown to the fore in the council structures and actions, local communities and businesses, as well as formulating a climate adaptation plan.
- 4.10 The Roadmap to Sustainability (2021-2028) is shaped around the United Nations Sustainable Development Goals that are most relevant to the Council. As well as shaping the practices of the Council, the Roadmap seeks

to encourage and promote sustainable behaviours of residents within the Borough.

5.0 EXTANT AREA PLANS

- 5.1 It should be noted that BMAP was adopted in September 2014 but was subsequently quashed as a result of a judgment in the Court of Appeal delivered on 18 May 2017. As a consequence of this, the North Down and Ards Area Plan 1984-1995, the Belfast Urban Area Plan, and Bangor Town Centre Plan 1995 are now the statutory Development Plans for the North Down area with draft BMAP remaining a material consideration. The Ards and Down Area Plan 2015 covers the remainder of the Borough which was previously Ards Borough Council. These plans remain extant until replaced by the new Local Development Plan (LDP) for the Borough. These existing plans are an important consideration in the LDP process, as they provide a starting point for the review of our spatial planning options.

Draft Belfast Metropolitan Area Plan 2015 (dBMAP)

- 5.2 Volume 7 of draft BMAP sets out policies for (former) North Down District. DBMAP 2015 does not contain specific provision for the development of renewable energy generation and states that it will be considered against the prevailing regional planning policies.

Ards and Down Area Plan 2015 (ADAP)

- 5.3 The ADAP was adopted in 2009 and relates to the legacy Ards Borough Council area. ADAP recognises that although the provision of public services and utilities within the plan areas is primarily the responsibility of a number of Government Departments and Agencies, the Council and statutory bodies, the role of the private sector is becoming more important. The Plan does not offer any specific provision for renewable energy development.

Cross Boundary Policy Context

- 5.4 Throughout the LDP process it has been important to take the position of other councils and particularly our neighbouring councils into account. Ards and North Down Borough is bounded by Belfast City, Lisburn and Castlereagh City and Newry, Mourne and Down Council areas, each of which is at different stages in the formulation of their own LDP.

Table 1: Neighbouring Councils Position on Renewable Energy

Council	Position
Belfast City Council	<p>Belfast City Council Local Development Plan Strategy was adopted on 2nd May 2023.</p> <p>-Policy ITU4: Renewable Energy Development. This policy seeks to ensure that renewable energy development is appropriately sited and highlights that environmental or technical reports may be required to ensure that there are no adverse environmental effects or significant impacts on environmental quality. The policy also gives additional criterion to be applied when assessing applications for wind energy development.</p> <p>This policy supports renewable energy generating facilities in appropriate locations, providing the proposal will not result in an unacceptable adverse impact.</p>
Lisburn and Castlereagh City Council	<p>Lisburn and Castlereagh City Council adopted its Local Development Plan 2032 draft Plan Strategy on 26th September 2023.</p> <p>-RE1: Renewable Energy Development -RE2: Integrated Renewable Energy</p> <p>These policies support renewable energy proposals unless they would have unacceptable adverse effects which are not outweighed by the local and wider environmental, economic and social benefits of the development.</p>
Newry, Mourne and Down (NM&D)	<p>The NM&D draft Plan Strategy was published on 27th June 2025. Policy RE1- Renewable and Low Carbon Energy Policy RE2- Renewable Energy and Energy Efficiency Measures in All Development.</p> <p>These policies support renewable and low carbon energy development in appropriate locations, protecting the historic and natural environment.</p>

- 5.5 The Council has engaged with each neighbouring Council's POP consultation as well as the dPS consultations of Belfast City Council and Lisburn and Castlereagh City Council.
- 5.6 Professional officers from the LDP team also take part in a number of cross council forums including the Metropolitan Spatial Working Group and the Development Plan Working Group.
- 5.7 Most recently, online engagement on the Council's draft Plan Strategy was held with the three neighbouring councils in March 2025. This included discussion around the proposed growth strategy, strategic housing and employment land allocation, settlement hierarchy, strategic approach to climate change and mitigation, alongside operational policies. This included the identification of specific cross-boundary issues.

6.0 PROFILE OF RENEWABLE ENERGY IN ARDS AND NORTH DOWN

- 6.1 In December 2021 the Department for the Economy published The Northern Ireland Energy Strategy 'Path to Net Zero Energy' which set a long-term vision of net zero emissions and affordable energy including a target to meet 70% of electricity consumption from a diverse mix of renewable sources by 2030. In June 2022, the Climate Change Act (Northern Ireland) 2022 increased this target to meet at least 80% of electricity consumption from renewable sources by 2030.
- 6.2 In 2021, SONI (the system operator for Northern Ireland) and EirGrid (the system operator for Ireland) published 'Shaping our Electricity Future' a roadmap to achieve our renewable ambition. This document sets out the plan to ensure that the electricity transmission grid in Northern Ireland and Ireland is ready meet the demands of an increase in renewable energy generation. In July 2023, SONI and EirGrid produced an updated Roadmap 'Shaping Our Electricity Future Roadmap Version 1.1) outlining a pathway towards meeting enhanced government electricity ambitions.
- 6.3 Of all renewable energy generated within Northern Ireland over the 12-month period October 2022 to September 2023, 83.8% was generated from wind as shown in the following chart.

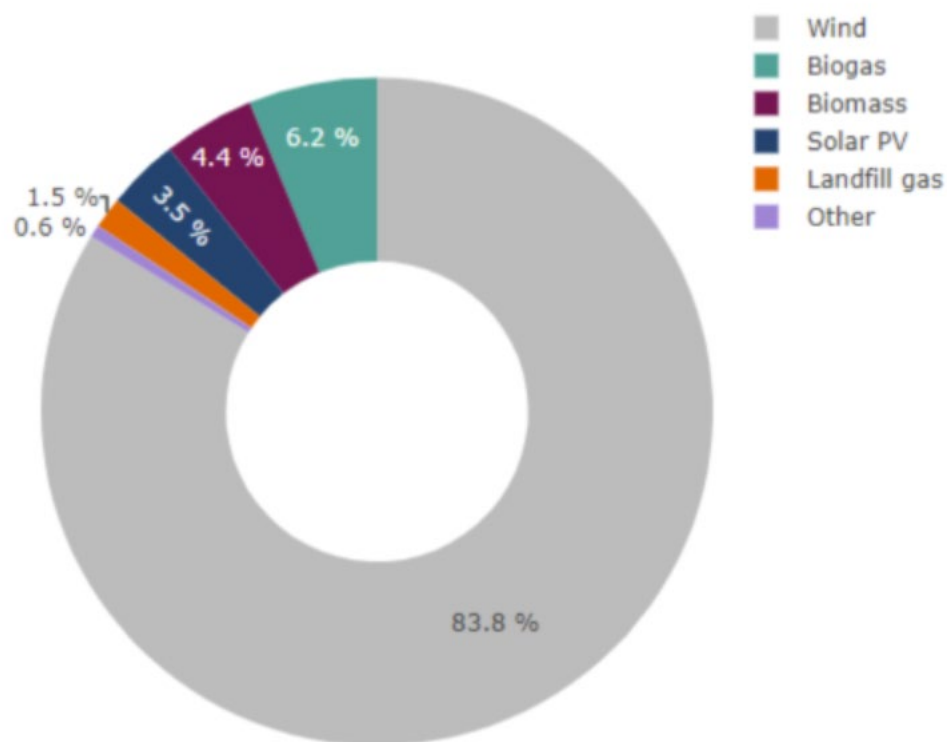


Figure 1: Electricity Consumption and Renewable Generation in Northern Ireland (Source: Department for the Economy, December 2023).

- 6.4 According to the Northern Ireland Planning Statistics: Second Quarter 2023/24 Statistical Bulletin, twenty renewable energy applications were received in Q2 2023/24; down from previous quarter (23) and the same period the previous year (15).
- 6.5 Figure 2 shows the number of renewable energy applications in NI, quarterly from April 2012 to September 2022. The number of applications received during July to September peaked in 2013/14 at 238. It is likely that the high levels at this time were driven by the NI Executive's targets by way of the Northern Ireland Renewables Obligation for electricity consumption from renewable sources. The sharp decline in recent years (a 88.7% decrease from 238 applications in Q1 2013/14 to 27 applications in Q2 2022/23) may be partly due to a reduction in government funding available, as well as a lack of capacity on the power grid to allow for new connections.

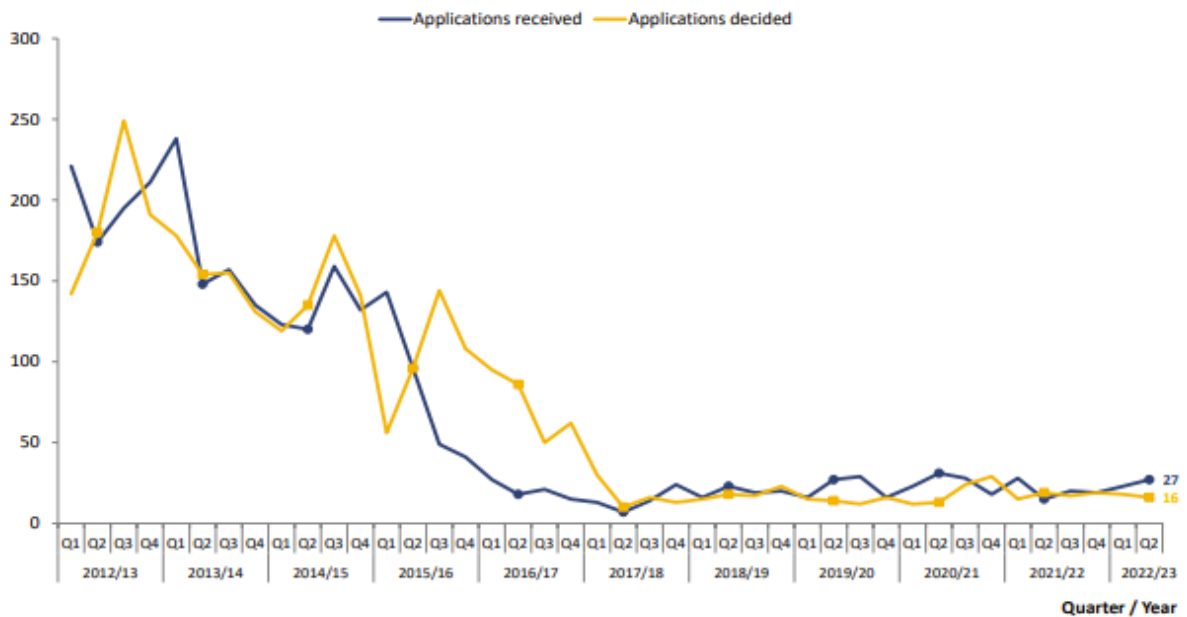


Figure 2: Planning applications for renewable energy in NI (NI Planning Statistics Second Quarter 22/23 Statistical Bulletin)

- 6.6 According to the NI Census in 2021, 4.78% of households in Ards and North Down had a form of renewable energy system installed. Overall, 5.25% of households in Northern Ireland have a renewable energy system installed. The most popular installation in Ards and North Down was solar panels for electricity generation (3.07% of households) and secondly, solar panels for hot water provision (2.22% of households).
- 6.7 Battery Energy Storage Systems (BESS) are a type of energy storage technology that use a group of batteries in the grid to store electrical energy. They help match intermittent generation from renewable energy sources, such as wind and solar with the peaks and troughs of real time electricity. This provides a secure and reliable electricity supply to customers and enables a reduction in wholesale energy prices. Planning permission was granted in 2023 for a BESS in Ballyharry Business Park in Newtownards. This has not yet been constructed.

7.0 PREFERRED OPTIONS PAPER

- 7.1 The Preferred Options Paper (POP), published in March 2019 was the first formal stage in the preparation of the LDP for the Borough. It was designed to promote debate in relation to a range of strategic planning issues that have been identified in the Borough. The POP identified 42 key planning issues within the Borough and examined options for addressing these issues. In each case, a preferred option was highlighted and the rationale for selection of this option was given.
- 7.2 The POP also includes a review of the existing operational planning policies, largely contained within the suite of Planning Policy Statements. This review stimulated public debate on whether the existing policies are still suitable or whether a different approach would be more appropriate to meet local circumstances.
- 7.3 Following a minor revision to the online version of the POP, the 12-week consultation period was relaunched therefore the total consultation period from the official launch was 19 weeks.

POP Representations

- 7.4 The key issues identified in the POP referring to renewable energy are:
- 7.5 **Key Issue 4 - Facilitating the siting of renewable energy generating facilities in appropriate locations.**

The preferred option was option 4b: Consider all renewable energy proposals coming forward on a case by case basis whilst adopting the 'cautious approach' within designated landscapes as endorsed by the SPPS.

Of those who responded to the relevant question in the POP questionnaire, 58% agreed with the proposed option, 21% disagreed and 21% were unsure.

- 7.6 **Key Issue 5 - On-site renewable generation and reduced energy consumption in new development.**
- The preferred option was option 5a - Introduce policy requiring applicants to demonstrate how the integration of on-site renewable generation and measures to reduce energy consumption have been considered and incorporated in all proposals for new development. The submission of a

statement along with the planning application will outline how the proposal shall incorporate sustainability and energy reduction through the buildings life span. The Council recognises the potential in introducing such measures not only in terms of their environmental benefits but also the potential to reduce fuel poverty and to increase energy security.

7.7 Of those who responded to the relevant question in the POP questionnaire, 47% agreed with the proposed option, 44% disagreed and 9% were unsure.

7.8 For further details on the POP consultation, please see the Preferred Options Paper Consultation Report, published on the Council website.

Consultee and Councillor Engagement

7.9 In order to meet the requirements of the Planning Act relating to the need for the Plan Strategy to take account of the RDS, other policy and guidance issued by the Department and other relevant government strategies and plans; Council has engaged key consultees representing relevant central government departments and agencies.

7.10 The following POP consultation responses were received from key consultees regarding renewable energy.

7.11 The Department for Infrastructure acknowledges the evidence base information and policy context contained in the POP, however it considers that further work should be undertaken to update the evidence base on landscape character assessments, in order to support policies that will be brought forward in the draft Plan Strategy. It is noted that the SPPS information on mitigating and adapting to climate change is a developing knowledge area. It is also noted that the POP focusses on wind energy and that it would be useful to seek views on a wider range of renewable issues.

7.12 The Department for the Economy were supportive of the POP. However, one issue of concern was raised regarding issue 4b which would see the Council consider all renewable energy sources on a case by case basis whilst adopting the cautious approach within designated landscapes as endorsed by the SPPS. The Department felt that policy should be very specific in this regard in order to ensure that there is no ambiguity which could be manipulated by those who are simply opposed to renewable technologies.

7.13 The Housing Executive's preferred approach was option 4a, to identify specific landscape policy areas suitable for renewable energy development. They also recognised the need to combine this with a precautionary approach. The

Housing Executive believe that the LDP can also improve energy efficiency through a fabric first approach, promoting solar gain and energy efficient measures. As the Home Energy Conservation Authority for Northern Ireland, the Housing Executive supports the Council's approach that all new development proposals should demonstrate how the integration of on-site renewable generation and measures to reduce energy consumption have been considered and incorporated into the design.

- 7.14 Representatives from relevant Council departments have also been engaged to ensure that due account has been taken of Council's Community Plan, as well as other council strategies and initiatives. Officers from the LDP team have taken part in a series of Community Plan thematic group meetings and engagement events. Furthermore, members of the community plan team have also attended LDP workshops and sustainability appraisal meetings.
- 7.15 The Planning Act requires the Plan Strategy to be adopted by resolution of the Council, following approval by the Department from Infrastructure (DfI). Accordingly, Elected Members have also been engaged in the development of the draft Plan Strategy, to ensure that the document generally aligns with the Council's strategic priorities. This engagement was facilitated through two Council workshops. The first of these was held on 20th March 2018 and provided an introduction to the topic for members and a second workshop on 19th November 2019 focussed on policy. Background papers were circulated to all members prior to these events. Members were largely supportive of modifications to the policy, supporting emerging technologies and providing scope for future developments in this area.
- 7.16 The draft Plan Strategy which included policies for renewable energy was presented in confidence to full Council in September 2022. Post Sustainability Appraisal (SA), a number of amendments to policy were made and brought before Planning Committee for agreement in 2024, with final approval secured at a Special Planning Committee meeting held on 20 January 2025 and ratified at the full Council meeting on 29 January 2025.

Development Management Engagement

- 7.17 The LDP team has engaged with Development Management (DM) colleagues throughout the preparation of the draft Plan Strategy with a meeting occurring in November 2019 in advance of workshopping policy with Elected Members.

- 7.18 Discussion included the possibility of identifying areas where renewable energy development such as wind turbines might be acceptable in principle, conversely the sensitivity of much of the Borough's landscapes to such development was also raised. Additional discussion centred around whether RE 2 should have specific targets and if so, how would technical information be assessed by planners without the necessary skills or knowledge.

8.0 DRAFT PLAN STRATEGY APPROACH

- 8.1 The draft Plan Strategy provides a policy approach for renewable energy in support of the ambitious energy targets set out in the Climate Change Act (NI) 2022, and, as set out above, has evolved from a consideration of a range of other factors including:
- the Council's Community Plan and other relevant strategies;
 - regional strategic policy contained within the RDS and SPPS;
 - the evidence base;
 - consultation through both the formal POP consultation process and informal consultation with statutory consultees;
 - consultation with neighbouring councils;
 - engagement with Elected Members;
 - engagement with internal planning colleagues and cross-Council colleagues; and
 - Sustainability Appraisal.
- 8.2 The draft Plan Strategy approach is to positively facilitate the Borough's potential for renewable and low carbon energy development by:
- Supporting renewable energy generation and storage in suitable locations where they are not considered likely to cause unacceptable adverse impact; and
 - Promoting low/zero carbon principles at the heart of all new development in the Borough.

Renewable and Low/Zero Carbon Energy Development

- 8.3 The Council initially considered introducing a spatial approach to renewable energy i.e. designating certain areas within the Borough as being ‘acceptable in principle’ for wind or large-scale solar energy development. This was not brought forward as the preferred option at POP stage due to concerns about the cumulative impact of concentrating wind energy development in certain areas. The Council has considered the evolving evidence base in relation to its updated Landscape Character Area Review¹ alongside supplementary planning guidance ‘Wind Energy in Northern Ireland’s Landscapes²’ (NIEA, 2010), and officers’ own experience and knowledge of the sensitivity of much of the landscapes within the Borough to wind or large-scale solar energy development. This evidence supports the Council’s decision not to carry forward a spatial approach at this time.
- 8.4 The starting point for the consideration of subject specific planning policy was the extant operational policy contained within PPS 18: Renewable Energy. The POP preliminary policy review found that policy RE 1 was working well in large part and there was no evidence to support a significant departure.
- 8.5 Para 6.223 of the SPPS³ introduces a ‘cautious approach’ to renewable energy development within designated landscapes of significant value. The determining weight to be given to the wider environmental, economic and social benefits of renewable energy development also changed from ‘significant’ to ‘appropriate’ (SPPS para 6.225). The policy review did support updating the draft policy RE 1 to adopt these wording changes of the SPPS for consistency and in the absence of evidence for an alternative approach.
- 8.6 The Council has incorporated re-powering of existing sites, emerging technologies and renewable energy storage such as Battery Energy Storage Systems (BESS) within its policy wording for renewable energy in Policy RE 1.
- 8.7 Following Sustainability Appraisal (SA), the justification and amplification of Policy RE 1 was expanded to reference the links between AD facilities and potential increase in ammonia emissions and subsequent environmental impacts. The text was also expanded to include further information on types of renewable energy other than wind. Specific references to designated landscapes of significant value were widened to include Nendrum Area of Significant Archaeological Interest (ASAI) alongside Strangford and Lecale

¹ See Technical Supplement 9

² <https://www.infrastructure-ni.gov.uk/publications/wind-energy-development-northern-ireland-landscapes>

³ DfI is currently reviewing regional strategic planning policy for renewable and low carbon energy and carried out consultation on draft revised policy in 2023.

Area of Outstanding Natural Beauty (AONB), and Areas of High Scenic Value (AoHSV).

Reduced Energy Consumption and Use of Low/Zero-Carbon Energy

- 8.8 The POP preliminary policy review of PPS 18: Renewable Energy, identified an option in relation to passive solar design to be considered at POP stage that could supersede policy RE 2 – this became the preferred option 5a:
- ‘Introduce policy requiring applicants to demonstrate how the integration of on-site renewable generation and measures to reduce energy consumption have been considered and incorporated in all proposals for new development.’
- 8.9 This was in response to the extant policy context being one of ‘facilitating and encouraging’ whereas the Council wished to raise the policy test to require that applicants demonstrate how measures to reduce energy consumption and use low/zero carbon sources of energy have been considered and incorporated in all development.
- 8.10 Justification and amplification text has been added to clarify that the measures considered should be proportionate to the nature and scale of the development proposed.
- 8.11 The policy also cross-references Policy AT 1 that requires applicants demonstrate how they have maximised the promotion of active travel and sustainable transport.

9.0 SOUNDNESS

- 9.1 The LDP has been prepared to meet the tests of soundness as set out in the DfI Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy in so far as it relates to renewable energy subject policies and other relevant policies in the document is regarded as sound, as it is considered to have met the various tests of soundness as summarised below:

Table 1: Consideration of Soundness

Procedural Tests	
P2	The renewable energy policies have evolved from the POP, POP consultation Report and Consultee, Development Management and Councillor Engagement as described in earlier sections of this document.
P3	The renewable energy policies have been subject to Sustainability Appraisal. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	
C1	The renewable energy policies have taken account of the RDS in particular RG 9.
C2	The renewable energy policies have taken account of our Community Plan, particularly outcomes 4 and 5.
C3	The renewable energy policies have taken account of existing planning policies as contained within the SPPS, in particular paragraphs 6.214 - 6.234.
C4	The renewable energy policies have taken account of the existing development plans within Ards and North Down, ongoing Council initiatives and the neighbouring council context.

Coherence and Effectiveness Tests

CE1	The renewable energy policies have taken account of the emerging LDP's of our three neighbouring Councils, and are not considered to be in conflict with them.
CE2	The renewable energy policies are founded on a robust evidence base which includes the baseline information assembled in the Public Utilities and Energy Position Paper, the POP and responses to it and subsequent consultation with consultees, including Dfl.
CE3	The monitoring framework within the draft Plan Strategy sets out how planning approvals for renewable energy infrastructure and those including measures to reduce likely energy consumption and/or use decentralised, renewable or zero/low-carbon energy supply will be monitored.
CE4	Renewable energy policies will be reviewed at Plan Review stage. Where possible, the need for flexibility has been considered in the strategic approach and draft policies. There will be flexibility to incorporate requirements in respect of renewable energy to key site requirements for zoned sites at LPP stage.