

2 Planning Policy

Introduction

- 2.1. This Planning Policy chapter has been prepared by Turley on behalf of the applicant, RES Ltd. Turley are a full service national planning and development consultancy with experience of over 30 years of working in planning and property from a network of offices across the UK and Ireland.
- 2.2. This chapter demonstrates how energy and planning policy considerations have been addressed in the development proposal. The chapter opens by describing the high level policy context within which the project has been conceived and falls to be determined. It then assesses the project's compliance with operational planning policy on a policy by policy basis.

Legislation and Policy Framework

UN GLOBAL POLICY

Rio Earth Summit

- 2.3. Since the Earth Summit in Rio de Janeiro in 1992 there has been a global trend in the search for more sustainable energy production. A number of key documents, including the Rio Declaration on Environment and Development and the Framework Convention on Climate Change, were developed as a result of the summit. The Rio Declaration (UNEP, 1992) set out 27 guiding principles for sustainable development and emphasised that long term growth needed to be grounded in the environment.
- 2.4. Since the 1992 Earth Summit, the subject of renewable energy has been at the forefront of UN policy with a goal to increase the uptake of renewable technologies. The main driver behind this goal has been the increasing greenhouse gas (GHG) emissions and their climate change consequences.

Kyoto Protocol

- 2.5. The Kyoto Protocol of the United Nations Framework Convention on Climate Change (UNFCCC, 1998) originated from the Rio Earth Summit. The Protocol was adopted in Kyoto, Japan in 1997 and came into force in February 2005. It sets binding targets for reducing GHG emissions that apply to 37 industrialised countries (including the European Community), which have a target to reduce GHG emissions from 1990 levels by 5% over the period of 2008 to 2012. Within this, the European Community has a reduction target of 8% which is distributed across the member states. The United Kingdom's reduction target is 12.5% (European Union, 2002).
- 2.6. The Kyoto Protocol sets out measures by which countries can meet their reduction targets. As a result, the Protocol resulted in the creation of a 'Carbon Market'

where GHG emissions are tracked and traded as a commodity. It can be seen as the main catalyst for the development and promotion of renewable technologies.

The Paris Agreement

2.7. The Paris Agreement establishes a framework for global climate action including the mitigation of and adaptation to climate change, support for developing nations and the transparent reporting and strengthening of climate goals. The European Union signed The United Kingdom of Great Britain and Northern Ireland up to the Agreement on 22 April 2016 and it came into force on the 18 December 2016.

COP26

2.8. The 26th UN Climate Change Conference of the Parties (COP26) took place in Glasgow on 21 October - 12 November 2021, attended by the countries that signed the United Nations Framework Convention on Climate Change. At COP 26, Nations adopted the Glasgow Climate Pact, aiming to turn the 2020s into a decade of climate action and support. Key outcomes included strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the required necessary finance. Nations reaffirmed their duty to fulfil the pledge of providing \$100 billion annually to developing countries. They collectively agreed to reduce the gap between existing emission reduction plans and what is required to reduce emissions in order to limit the rise in the global average to 1.5 degrees. Nations were called upon to phase down unabated coal power and inefficient subsidies for fossil fuels.

2.9. As part of the package of decisions, nations also completed the Paris Agreement's rulebook relating to market mechanisms and non-market approaches and the transparent reporting of climate actions. This set of rules lays out how countries are held accountable for delivering on their climate action promises and self-set targets under their Nationally Determined Contributions (NDCs). At COP26, Nations reached new agreements for market mechanisms, essentially supporting the transfer of emission reductions between countries while also incentivising the private sector to invest in climate-friendly solutions.

Strategic European Energy Review

2.10. The Strategic Energy Review was first published in 2007 to establish a core energy policy for all of Europe (Commission of the European Communities, 2007). An agenda was agreed in order to achieve the key energy objectives of:

- Sustainability;
- Competitiveness and security of supply;
- Reducing GHG emissions by 20%;
- Obtaining 20% of energy consumed from renewable energy sources; and
- Improving energy efficiency by 20%.

- 2.11. The Review was updated in 2008 (Commission of the European Communities, 2008), in order to propose an Energy Security and Solidarity Action Plan, which focused on diversification of energy supply, energy efficiency and making the best of the European Union's indigenous energy resources.
- 2.12. Development of renewable energy reserves, including wind, solar, hydro, marine and biomass energy are seen as the main sources of indigenous energy.

The Energy Road Map 2050

- 2.13. The Road Map (Commission of the European Communities) sets out a long-term vision for renewable energy sources in the European Union and it forms an integral part of the Strategic European Energy Review. The Energy Roadmap 2050 sets out the transition and cost effective pathways for key economic sectors for achieving an 80-95% reduction in EU emissions by 2050. To achieve this goal, significant investment is needed in new low-carbon technologies and infrastructure, energy efficiency and renewable energy.
- 2.14. The 2050 target will not be shifted into national targets via EU legislation, but allows more flexibility for Member Countries to meet their greenhouse gas emission reduction targets in the most cost effective method in regards to their own specific circumstances.

EU Directive 2009/28/EC on the Promotion of the use of Energy from Renewable Sources

- 2.15. In 2009, EU Directive 2009/28/EC (European Union, 2009) came into force in order to update Directive 001/77/EC in promoting the use of energy from renewable sources. Goals of the Directive are to improve the security and diversification of energy supply and to provide environmental protection and social and economic cohesion. The 2009 Directive further establishes this framework for promoting energy from renewable sources and it updates national targets relating to this goal. It also requires each member state to have a national renewable energy action plan in place and ready for adoption by 30 June 2010. The updated goals of the 2009 Directive are:
 - A 20% target for electricity from renewable sources by 2020; and
 - The UK to achieve 10% of electricity from renewables by 2010, and 15% by 2020.
- 2.16. The Directive was revised in 2016 to make the EU a global leading in renewable energy and ensure that the target of the final energy consumption being at least 27% renewables is met by 2030.

UK ENERGY POLICY

UK Climate Change Programme

2.17. The UK government developed a Climate Change Programme in 2000 (DECC, 2000) in response to its commitment at the 1992 Earth Summit at Rio de Janeiro. The Programme was updated in 2006 (DECC, 2006). It sets out the UK's policies and priorities for action to reduce greenhouse gas emissions. Broadly, the targets for the UK are as follows:

- Reducing GHG emissions to 12.5% below 1990 levels by 2008-2012; and
- Moving towards a domestic UK goal of 20% cut in CO₂ emissions below 1990 levels by 2010.

UK Climate Change Act 2008

2.18. The UK government in June 2019 set out amendments to the Climate Change Act 2008 in the Climate Change Act 2008 (2050 Target Amendments) Order 2019. This is to ensure net greenhouse gas emissions in 2050 are at least 100% lower than the 1990 baseline. The targets set out in the Act, which cover all sectors of the economy, are legally binding and came into effect on 27 June 2019. The 'net zero' target represents a significant step-change in the commitment to addressing the climate crisis.

UK Renewable Energy Strategy 2009

2.19. The UK Renewable Energy Strategy, published by the Department of Energy and Climate Change (2009), forms the basis of the UK National Renewable Energy Action Plan required under the terms of the Renewable Energy Directive (2009/28/EC). The Strategy sets out the path required for the UK to meet its legally binding target, in order to ensure that 15% of our energy (across electricity, heat and transport) comes from renewable sources by 2020. This is a seven fold increase in the share of renewable energy sources in scarcely more than a decade.

2.20. It makes it clear that achievement of such a target will only be possible with strong co-ordinated efforts by central, regional and local government as well as public groups, the private sector and dedicated communities. It clearly sets out the role Government will adopt and the specific actions it will take in order to deliver the strategy.

UK National Renewable Energy Action Plan 2010

2.21. This National Renewable Energy Action Plan provides details on a set of measures that would enable the UK to meet its 2020 target (Department of Energy and Climate Change (DECC), 2010). The 2009 Renewable Energy Directive sets a target for the UK to achieve 15% of its energy consumption from renewable sources by 2020. This compares to only 1.5% in 2005.

NORTHERN IRELAND ENERGY POLICY

Strategic Energy Framework for Northern Ireland 2010

- 2.22. The aim of the Framework (DETI, 2010) is to set out the direction for energy policy for the region. It is an update to the 2004 Strategic Energy Framework which recognises that significant changes have taken place since the publication of the 2004 framework, setting out a goal for Northern Ireland to increase to 40% of electricity consumption from renewable sources by 2020.
- 2.23. The Strategic Energy Framework recognises the importance of renewable energy and onshore wind in particular in helping Northern Ireland secure its energy supply and meet European and national targets.
- 2.24. The Framework is committed to supporting and developing the industry.

Northern Ireland Energy Strategy - Path to Net Zero Energy

- 2.25. In part due to the recognition that the 40% target set in the existing Strategic Energy Target has been met, the Department for the Economy commenced work to developing a new Energy Strategy for Northern Ireland. The publication of a Call for Evidence was undertaken in 2019 and was part of an on-going public engagement process to inform and shape the strategy. The Call for Evidence was the first stage in a programme of work aimed at developing a new long-term strategy for decarbonisation of the Northern Ireland energy sector by 2050 at least cost to the consumer.
- 2.26. The Department for Economy set out intentions of an Energy Strategy Options public consultation issued by the end of March 2021, with the responses from this informing the final Energy Strategy.
- 2.27. The work by the Department for Economy on the Energy Strategy is set in the context of their Analytical Services Unit data published on 4 June 2020 which confirms that for the 12 month period April 2019 to March 2020, 46.8 per cent of total electricity consumption in Northern Ireland was generated from renewable sources located in Northern Ireland. This represents an increase of 3.9 percentage points on the previous 12 month period (April 2018 to March 2019) and is the highest rolling 12 month proportion on record.
- 2.28. In terms of the volume of electricity consumption between April 2019 and March 2020, some 7,695 Gigawatt hours (GWh) of total electricity was consumed in Northern Ireland. Over the same period, some 3,604 GWh of electricity was generated from renewable sources within Northern Ireland.
- 2.29. Of all renewable electricity generated within Northern Ireland over the 12 month period April 2019 to March 2020, 85.4 per cent was generated from wind. This compares to 84.7 per cent for the previous 12 month period (April 2018 to March 2019).
- 2.30. The new Energy Strategy - The Path to Net Zero Energy was published in December 2021. It outlines a roadmap to 2030 aiming to deliver a 56% reduction in energy-

related emissions, on the pathway to deliver the 2050 vision of net zero carbon and affordable energy. The Energy Strategy sets three main targets to drive these changes including delivering energy savings of 25% from buildings and industry by 2030; doubling the size of the low carbon and renewable energy economy to a turnover of more than £2bn by 2030; and meeting at least 70% of electricity consumption from a diverse mix of renewable sources by 2030. Such provisions would be in alignment with the Republic of Ireland's aim of 70% renewable electricity by 2030 as set out within the Region's Renewable Electricity Support Scheme (RESS). The Energy Strategy recognises that meeting this 70% target likely means doubling renewable energy capacity in order to meet new demands from heating our homes and powering our vehicles.

- 2.31. A more ambitious target under the Climate Change (No.2) Bill of 80% renewable energy by 2030 and achieving carbon net zero by 2050 was passed in the Northern Ireland Assembly in March 2022.

Northern Ireland Executive Programme for Government

- 2.32. The 2011-2015 Programme for Government (OFMDFM Economic Policy Unit, 2011) underlined the Northern Ireland Executive's commitment to the principles of an open and accountable government. The Programme established a key commitment seeking the achievement of 20% of electricity consumption from renewable sources and 4% renewable heat by 2015 in Northern Ireland and introduced milestones to reach in the intervening years to meet these targets. Priorities of the Executive included:
- 2.33. Growing a Sustainable Economy and Investing in the Future;
- Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing;
 - Protecting Our People, the Environment and Creating Safe Communities;
 - Building a Strong and Shared Community; and
 - Delivering High Quality and Efficient Public Services.
- 2.34. The Executive reported that it will continue to work towards a reduction in greenhouse gas emissions by at least 35% on 1990 levels by 2025 (DOE).
- 2.35. A new draft Programme for Government Framework was consulted on during 2016 and uses an outcomes-based approach. These outcomes are things with which people can identify, such as living longer and healthier lives or attracting better jobs - and are designed to stay in place for a generation rather than a single Assembly term.
- 2.36. Since June 2018 and in the (then) absence of an Executive and continued absence of a final Programme for Government, the NI Civil Service Outcomes Delivery Plan (ODP) became a key strategic document, setting out the actions that departments had put in place to give effect to the objective of improving wellbeing for all by tackling disadvantage and driving economic growth. The development of the new Energy Strategy was identified as contributing to a Key Strategic Area within

Outcome 1 - 'We prosper through a strong, competitive, regionally balanced economy.' Outcome 2 - 'We live and work sustainably - protecting the environment' references reductions in greenhouse gas emissions. The expansion of onshore wind capacity in Northern Ireland provides a clear route to delivering required long term reductions in greenhouse gas emissions.

Onshore Renewable Electricity Action Plan 2011-2020

- 2.37. The Department of Enterprise, Trade and Investment (DETI) published the Onshore Renewable Electricity Action Plan 2013-2020 (OREAP) for Northern Ireland in November 2013. The overarching aim of the OREAP is to optimise the amount of electricity sustainably generated from onshore renewable resources in order to enhance diversity and security of supply, reduce carbon emissions, contribute to Northern Ireland's target of 40% of electricity consumption to come from renewable energy sources by 2020 and to develop business and employment opportunities for Northern Ireland companies.
- 2.38. The OREAP states that with a lack of indigenous fossil fuel, no nuclear power stations and a wealth of potential renewable resources such as wind, the development of renewable technologies will play a vital role in the diversification of the future energy mix in Northern Ireland and could deliver significant investment and employment opportunities.
- 2.39. OREAP focuses on renewable assessments undertaken by DETI and concludes from such reports that onshore wind still has significant deployment potential. However, deployment rates are slower than previously modelled. The results of the Strategic Environmental Framework (SEF) which support the plan provide "there is still capacity for additional development to be accommodated in existing locations, for example, in the northwest". Furthermore, it is maintained that clustering development in existing locations could reduce potentially significant adverse effects occurring in other undeveloped locations.
- 2.40. Development should also be targeted to areas where there is already access to the grid or where grid upgrades or the provision of new infrastructure has already been planned and assessed. The plan concludes that in order to manage or limit potential adverse effects, the preferred option would be to allow onshore wind developments to continue, where possible, to cluster in existing areas of development, before moving into new areas.

Sustainable Energy Action Plan 2012 - 2015

- 2.41. The Action Plan was published by the DETI in May 2012 with the primary aim of clearly showing what the Northern Ireland Executive was doing to promote sustainable energy in Northern Ireland. The Plan recognises the importance of decarbonising energy production in Northern Ireland and working towards the target of 40% consumption of electricity from renewable sources by 2020.
- 2.42. A key action of the Plan is that the Northern Ireland Executive will work closely with developers, planners and those responsible for environmental consents to

ensure the need for renewable energy to address the environmental impact of climate change is recognised and that procedures are in place for consenting of renewable installations.

Everyone's Involved - Sustainable Development Strategy 2010

- 2.43. This Sustainable Development Strategy (OFMDFM May 2010) aims to bring viability, stability and opportunity to all of our social, economic and environmental activities and programmes. The vision for sustainable development echoes the Programme for Government. It is intended to reinforce the commitment to ensuring that the principles of sustainability reach into all activities of Government and that everyone is involved in achieving the objectives of the Sustainable Development Strategy.
- 2.44. The Strategy sets out the themes of economic prosperity, social cohesion, environmental protection and meeting our national and international responsibilities and there are two guiding principles that express the overarching ambitions of the Strategy:
- living within environmental limits; and
 - ensuring a strong, healthy, just and equal society.
- 2.45. There are four principles that describe the necessary conditions for the achievement of sustainable development:
- Achieving a sustainable economy
 - Promoting good governance
 - Using sound science responsibility
 - Promoting opportunity and innovation.
- 2.46. Six Priority Action Areas are then expressed providing the framework for the actions each department will take in support of achievement of sustainable development:
- Building a dynamic, innovative economy that delivers the prosperity required to tackle disadvantage and lift communities out of poverty.
 - Strengthening society such that it is more tolerant, inclusive and stable and permits positive progress in quality of life for everyone
 - Driving sustainable, long term investment in key infrastructure to support economic and social development.
 - Striking an appropriate balance between the responsible use and protection of natural resources in support of a better quality of life and a better quality environment.
 - Ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint.
 - Ensuring the existence of a policy environment which supports the overall advancement of sustainable development in and beyond government.

- 2.47. Priority Action Area 5 is of particular relevance and a set of Strategic Objectives have been identified that will be pursued in this area. These are the biggest and most urgent challenges in this Priority Area. The objectives are as follows:
- Reduce greenhouse gas emissions;
 - Increase the proportion of energy derived from renewable sources;
 - Implement energy efficiency measures particularly for vulnerable groups;
 - Increase energy security; and
 - Adapt to the impacts of climate change.
- 2.48. The strategy recognises that the Private Sector has a role to play, contributing innovation, focus and responsiveness in the move towards a 'sustainability focused' society. The strategy seeks to champion pro-activity and innovation across the private sector in support of the sustainability vision, creating a pathway to accelerate implementation of new technologies and solutions.

Tomorrow's Energy Scenarios Northern Ireland 2019 (TESNI 2019)

- 2.49. The System Operator for Northern Ireland (SONI) launched a consultation document - Tomorrow's Energy Scenarios Northern Ireland 2019 (TESNI 2019) in September 2019. This sets out scenario planning as a means to create a range of possible energy futures that capture the impact of changes in moving to low carbon electricity for NI.

Strategic Assessment Summary:

- 2.50. The rationale for the project is clear. Making an energy infrastructure contribution of the scale proposed (indicatively 50.4 MW) will assist in the achievement of NI strategic energy targets and objectives, consistent with a wide range of International, European, UK and Regional level priorities.
- 2.51. The proposal will offer job creation and economic activity to the regional economy providing significant benefits to and investment in Northern Ireland.
- 2.52. Given the 35-year lifetime of the Proposed Development it is expected that direct operational impacts equate to 35 job years, £1.27 million direct wages and £9.37 million of direct Gross Value Added over the operational phase.
- 2.53. Both the construction and operational phases will generate increased tax and business rates revenue and the proposal is estimated to involve a capital spend of £64.9 million.
- 2.54. The amount of electricity that could be produced by the Proposed Development is estimated at 206.4gWh per year which is equivalent to the needs of 54,800 homes each, or almost 85% of the current housing stock in the Causeway Coast and Glens Borough Council area.
- 2.55. The Proposed Development is also estimated to reduce CO₂ emissions by 90,800 tonnes each year, when compared against equivalent generation from non-renewable sources.

NORTHERN IRELAND PLANNING POLICY

Regional Development Strategy 2035 Building for a Better Future

- 2.56. The revised RDS was prepared under the Strategic Planning (Northern Ireland) Order 1999. It is an overarching strategic planning framework for the future development of Northern Ireland to 2035 and the spatial strategy of the Executive. The Order requires Departments to have regard to the RDS in exercising any functions in relation to development and it influences investment by the private sector. It represents the top tier in the hierarchy of planning policy and guidance in Northern Ireland and aims to provide a long term policy direction with a strategic spatial perspective. It is material to decisions on individual planning applications and planning appeals and is an important consideration in determining major planning applications of strategic importance. It was agreed by the Executive on 26 January 2012 following a 12-week public consultation exercise and stakeholder meetings.
- 2.57. The revised RDS sets out a vision and eight aims intended to support the Programme for Government. It also contains two types of Strategic Guidance - Regional Guidance of relevance everywhere in the region and Spatial Framework Guidance which is drafted specifically for each of five separate components based on functions and geography. The component of relevance to this project is the Rural Area.
- 2.58. The Regional Guidelines (RG) relevant to the project are RG4 (Promote a sustainable approach to the provision of tourism infrastructure), RG5 (Deliver a sustainable and secure energy supply), RG9 (Reduce our Carbon Footprint and Facilitate Mitigation and Adaption to Climate Change whilst maintaining Air Quality), and RG11 (Conserve, Protect and where possible, Enhance our Built Heritage and our Natural Environment).
- 2.59. RG4 states that tourism can make a step change in the economy and emphasises the quality of our natural assets. RG5 states that new energy generation or distribution infrastructure must be carefully sited to avoid adverse environmental effects, particularly on or near protected sites. It goes on to say that decision makers will have to balance impacts against the benefits from a secure renewable energy stream. There is a clear commitment to increasing 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...., including a wide range of renewable resources for electricity generation both onshore and offshore to meet the Region’s needs.”*
- 2.60. RG9 picks up the same theme of increasing the use of renewable energies and refers to the targets set in the Strategic Energy Framework. Having stated the targets RG9 confirms that “this {meeting the 40% target} will require increasing numbers of renewable electricity installations and the grid infrastructure to support them. These must be appropriately sited to minimise their environmental

- impact.” The same RG emphasises the need to protect and extend the ecosystems and habitats that can reduce or buffer the effects of climate change. Peat bogs are identified as sinks or stores for carbon if undisturbed.
- 2.61. RG11 states that the environment is one of Northern Ireland’s most important assets and emphasises the responsibility we have to protect it for the benefit of future generations. Specific objectives are set for the built and natural heritage including references to protecting archaeological sites/monuments, historic buildings/landscapes, priority species, designated habitat sites, landscape character, scenic quality, and protected landscapes.
- 2.62. The Spatial Framework Guidance (SFG) relates to each of the five key components of the Spatial Framework.
- 2.63. SFG13 (Sustain rural communities living in smaller settlements and the open countryside) refers to the need for development to be sensitive to the ability of landscapes to absorb development. Industries such as tourism and renewable energy are identified as being able to provide jobs and opportunities in rural areas so long as they are integrated appropriately within the rural landscape.
- 2.64. Section 4 of the revised RDS specifically addresses the matter of regionally significant infrastructure.
- 2.65. Paragraphs 4.15 to 4.18 refer specifically to renewable energy. Paragraph 4.15 refers to the 40% SEF target and states that “this is likely to mean an increase in the number of wind farms both on and offshore...” whereas Paragraph 4.16 refers to the need to strengthen the electricity grid. Paragraph 4.17 then goes on to state the importance of interconnection, whereas Paragraph 4.24 refers again to the need to increase the use of renewable energy sources to address climate change targets.
- 2.66. **Assessment:** Delivering a new installation for the generation of renewable energy is consistent with the imperative to meet the strategic energy targets and in line with the RDS’ expectation that this will mean an increase in the number of wind farms. This ES provides sufficient information on each of the interests of acknowledged planning importance identified in the RDS to conclude that the benefits of the scheme outweigh the mitigated environmental impacts.

Planning Policy Statements

Strategic Planning Policy Statement for Northern Ireland (SPPS)

- 2.67. The SPPS was published by the Department of the Environment on 28 September 2015 as a statement of policy on important planning matters. Agreed by the NI Executive and judged to be in general conformity with the RDS, its provisions apply to the whole of Northern Ireland and are material to all decisions on individual planning applications.
- 2.68. The existing suite of Planning Policy Statements (PPS) and the remaining provisions of the Planning Strategy for Rural Northern Ireland (PSRNI) will be cancelled when all eleven Councils have adopted a new Plan Strategy (para 1.9).

- 2.69. A transitional period will apply until such times as a Council's Plan Strategy has been adopted. Paragraph 1.10 states:
- 2.70. 'A transitional period will operate until such times as a Plan Strategy for the whole of the council area has been adopted. During the transitional period planning authorities will apply existing policy contained within the documents identified below together with the SPPS. Any relevant supplementary and best practice guidance will also continue to apply.'
- 2.71. Paragraph 1.12 sets out the approach which will be taken where there is conflict between the SPPS and retained policy:
- 2.72. Any conflict between the SPPS and any policy retained under the transitional arrangements must be resolved in the favour of the provisions of the SPPS. For example, where the SPPS introduces a change of policy direction and/or provides a policy clarification that would be in conflict with the retained policy the SPPS should be accorded greater weight in the assessment of individual planning applications. However, where the SPPS is silent or less prescriptive on a particular planning policy matter than retained policies this should not be judged to lessen the weight to be afforded to the retained policy.
- 2.73. Paragraph 1.13 identifies retained policy as including the following PPSs relevant to this project:
- PPS 2: Natural Heritage (considered within Chapters 4, 6, 7, 8 and 9)
 - PPS 3: Access, Movement and Parking (considered within Chapter 12)
 - PPS 3 (Clarification): Access, Movement and Parking (considered within Chapter 12)
 - PPS 6: Planning, Archaeology and The Built Heritage (considered within Chapter 5)
 - PPS 10: Telecommunications (Policy TEL 2 is cancelled) (considered within Chapter 3)
 - PPS 15 Revised: Planning and Flood Risk (considered within Chapter 10)
 - PPS 16: Tourism (considered within Chapters 4 & 5)
 - PPS 18: Renewable Energy (considered within Chapter 14)
 - PPS 21: Sustainable Development in the Countryside (considered within Chapters 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 & 14).
- 2.74. As per SPPS paragraph 1.12, in this period before the Council adopts its Plan Strategy, it is necessary to assess whether there is a conflict between the SPPS and any retained policy. Paragraph 1.12 provides an example of such a circumstance - where the SPPS contains a change in policy direction and/or a policy clarification in conflict with retained policy.
- 2.75. In his written statement dated 28 September 2015, introducing the SPPS, the Minister made the following comments:

- 2.76. There are a number of subject policies that are likely to be of particular interest to Assembly Members.
- 2.77. The first of these is Renewable Energy. Having taken into account all the comments received on the draft SPPS and following additional engagement with the Committee and others in relation to this particular policy area, the SPPS has been revised and improved.
- 2.78. There is a greater acknowledgement of the contribution the renewable energy industry makes towards achieving sustainable development, as a provider of jobs and investment across the region, and an acknowledgement of wider government policy support for the use of renewable energy sources. This includes reference to DETI's Strategic Energy Framework.
- 2.79. Furthermore, the SPPS seeks to more closely reflect PPS 18 by making it clearer that development that generates energy from renewable resources will be permitted where the proposal and any associated buildings and infrastructure, will not result in unacceptable adverse impacts on interests of acknowledged importance.
- 2.80. In relation to how the wider environmental, economic and social benefits are to be assessed the SPPS clarifies that planning authorities will give such considerations 'appropriate' weight in determining whether planning permission should be granted.
- 2.81. It is also considered appropriate that a cautious approach in designated landscapes, as per the current best practice guidance, is reflected in strategic policy and therefore this approach has been carried forward in the SPPS.
- 2.82. Where appropriate, the SPPS also takes into account the recommendations of the Report of the Environment Committee's Wind Energy Inquiry.
- 2.83. This statement confirms that the SPPS clarifies policy on the weight to be attached to social, environmental and economic considerations in the determination of planning applications. PPS18 Policy RE1 states that 'significant' weight 'must' be attached to such considerations whereas paragraph 6.225 of the SPPS states that 'appropriate' weight should be attached:
- 2.84. The wider environmental, economic and social benefits of all proposals for renewable energy projects are material considerations that will be given appropriate weight in determining whether planning permission should be granted.
- 2.85. The change in wording means that whereas PPS18 directs the weight to be attached to the benefits, the SPPS provides the decision maker with discretion in deciding the appropriate amount of weight to be attached to the benefits. In making such a judgement, it is anticipated that the decision maker will take account of the extent of the benefits in a relative or proportionate way. Where a scheme, such as this, will deliver large scale benefits (as set out within the Socio-Economic details at Chapter 14), it would be logical to suggest that the decision maker would conclude it appropriate to give significant weight to the benefits. The

consequence of this is that if a scheme would deliver only small-scale benefits, less weight would be attached to the benefits.

2.86. The other main provisions of PPS18 and its associated Best Practice Guidance are carried through into the SPPS including:

- The direction to take particular care when considering the potential impact of all renewable proposals on the landscape (para 6.222);
- The direction to apply a cautious approach for renewable energy projects within designated landscapes of significant value such as Areas of Outstanding Natural Beauty (para 6.223);
- The presumption in favour of renewables proposals where there will be no unacceptable adverse effect on the PPS18 set of planning considerations (6.224);
- Stating that renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest (para 6.226);
- Specifying that for wind farm development a separation distance of 10 times rotor diameter to occupied property, with a minimum distance of not less than 500m, will generally apply;
- Confirming that consideration of renewables projects will take account of their contribution meeting wider environmental benefits (para 6.228);
- Confirmation that the factors considered in a planning decision will include the wider environmental benefits as well as normal planning criteria (paragraph 6.229);
- A restatement of the acknowledgement that windfarms are highly visible in the landscape yet this does not render them unacceptable, and the reference to the skill of the designer and the characteristics of the receiving landscape (paragraph 6.230);
- The requirement, where a project will result in unacceptable damage, for an indication of how such damage will be minimised, mitigated and compensated for (paragraph 6.231);
- The requirement to provide details of future decommissioning and site restoration (paragraph 6.233);
- The direction to take account of the supplementary planning guidance 'Wind Energy Development in Northern Ireland's Landscapes' and all other practice notes in assessing all wind turbine proposals (paragraph 6.234).

2.87. This chapter considers the retained policy framework having regard to the SPPS and its associated transition arrangements.

Planning Policy Statement 2 - Natural Heritage

2.88. PPS2 is retained policy for the purposes of the SPPS transition arrangements. There is considered to be no conflict with the equivalent provisions in the SPPS, therefore

- until the Council adopts its Plan Strategy, its provisions will apply, together with the SPPS, with no less weight attached to the retained policy.
- 2.89. SPPS policy on Natural Heritage is set out on pages 80 to 85. It consolidates and restates policy set out in PPS2. The Minister did not identify any conflicts or clarifications in his statement launching the SPPS. The principal focus of this section is, therefore, on PPS2.
- 2.90. PPS2 was published in July 2013 and provides strategic planning policy for the conservation, protection and enhancement of the natural heritage. For the purpose of the PPS, natural heritage is defined as 'the diversity of our habitats, species, landscapes and earth science features'.
- 2.91. The policy lists its objectives as:
- To seek to further the conservation, enhancement and restoration of the abundance, quality, diversity, and distinctiveness of the region's natural heritage;
 - To further sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, economic and environmental development;
 - To assist in meeting international (including European), national and local responsibilities and obligations in the protection and enhancement of the natural heritage;
 - To contribute to rural renewal and urban regeneration by ensuring developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high-quality environment;
 - To protect and enhance biodiversity, geo-diversity and the environment; and
 - To take actions to reduce our carbon footprint and facilitate adaptation to climate change.
- 2.92. The policy at paragraph 3.3 notes that in taking decisions, the Department should ensure that appropriate weight is attached to designated sites of international, national and local importance; priority and protected species; and to biodiversity and geological interests within the wider environment.
- 2.93. At section 5 the PPS lists the policy context and statutory framework, addressing international, national and local contexts.
- 2.94. Relevant policies to the Proposed Development include:
- Policy NH2 - Species Protected by Law
 - Policy NH4 - Sites of National Conservation Importance - Local;
 - Policy NH5 - Habitats, Species or Features of Natural Heritage Importance;
 - Policy NH6 - Areas of Outstanding Natural Beauty.
- 2.95. The policies outline that a development will only be granted planning permission if it does not have a significant adverse impact on the environment. In the instance that there will be an adverse impact on a site, development may only be permitted

when the benefits of the Proposed Development outweigh the value of the site, habitat or species.

European and National Species

- 2.96. In relation to European and National species protected by law, Policy NH2 sets out the relevant planning policy requirements. In relation to European protected species, the policy states that planning permission will only be granted for a development proposal that is not likely to harm a European protected species. It goes on to identify exceptional circumstances. In relation to National protected species, the policy states that planning permission will only be granted for a development proposal that is not likely to harm any other statutorily protected species and which can be adequately mitigated or compensated against.
- 2.97. **Assessment:** Chapters 7, 8 and 9 of this ES assess the impact of the project on protected European and National Species.
- 2.98. Chapter 7 provides an ecological and nature conservation assessment in respect of terrestrial Fauna. The potential effects of the Proposed Development on ecological receptors have been assessed and it is concluded that with the implementation of appropriate mitigation measures the effects would be reduced to a minor adverse or neutral effect that would not adversely affect the ecological integrity of the site and the wider area.
- 2.99. An assessment of cumulative impacts on the habitats and fauna of the area was also undertaken and concluded that this will not have a significant impact.
- 2.100. There is no regular usage of the area by smooth newt or marsh fritillary butterfly and therefore no impacts to these species is likely. Mitigation for the reptiles found on site (i.e. common lizard) is proposed. This involves the provision of habitat management, as well as drift fencing and mowing/hand clearance during the construction phase. All badger setts have also been buffered by the required 25m from any infrastructure.
- 2.101. The proposed outline HMP will ensure compensation for areas of NI Priority Habitat lost under the footprint of the Proposed Development and should also result in enhancement of the local site ecology.
- 2.102. The mitigation measures proposed ensure that any potential impacts to bats will be negligible and the site poses little risk to bats or bat populations. A Bat Monitoring Mitigation Plan (BMMP) has been recommended as a precaution.
- 2.103. Chapter 8 assesses the impact of the Proposed Development from an ornithological perspective and concludes that with the exception of the displacement of up to two pairs of breeding snipe there are no significant effects on bird communities. Assuming implementation of the proposed mitigation measures detailed in Chapter 8, there are no remaining residual effects and no likely cumulative effects have been identified.
- 2.104. Mitigation measures are recommended to include a programme of long term habitat management to compensate for the potential displacement of the two pairs of snipe. In addition, there is to be an Ornithology Mitigation Strategy (OMS) to protect breeding birds during the construction phase and an Ornithology Management and Monitoring Plan (OMMP) to ensure implementation of the long term habitat

- management and to monitor the effects of the Proposed Development on local bird communities.
- 2.105. Chapter 9 assesses the impact of the Proposed Development from a fisheries and aquatic ecology perspective and considers the potential effects of the construction, operation and decommissioning of the development on these interests. The potential impacts are primarily related to sediment run-off and the potential release of other pollutants to the receiving watercourses with related effects on fish stocks and the wider stream ecosystem.
- 2.106. A series of specific mitigation measures have been designed to avoid adverse effects on fisheries with regard to both construction and operational phases of the project. Hydrology and site drainage issues have been considered in detail in Chapter 10, which outlines a surface water management system and drainage (SuDS) designed to control drainage and silt management on the Site.
- 2.107. Provided these measures are implemented, it is concluded that the construction and operation of the Proposed Development will have a neutral impact on the fish stocks and aquatic ecology of site drainage streams and the main downstream receiving watercourses.
- 2.108. The Proposed Development therefore complies with Policy NH2.

Habitats, Species or Features of Natural Heritage Importance

- 2.109. Policies relevant to Habitats, Species or Features of Natural Heritage Importance are set out at Policy NH5. The policy indicates that a development proposal which is likely to result in an unacceptable adverse impact on, or damage to, habitats, species or features may only be permitted where the benefits of the Proposed Development outweigh the value of the habitat, species or feature. In such cases, appropriate mitigation and/or compensatory measures will be required.
- 2.110. This policy applies to priority habitats; priority species; active peatland; ancient and long-established woodland; features of earth science conservation importance; features of the landscape which are of major importance for wild flora and fauna; rare or threatened native species; wetlands (includes river corridors); and other natural heritage features worthy of protection.
- 2.111. **Assessment:** Chapters 6, and 7 this ES assess the impact of the project on important habitats, species and features of natural heritage importance, including peat and active peatland.
- 2.112. Chapters 6 and 7 conclude that the proposed outline HMP will ensure compensation for areas of NI Priority Habitat lost under the footprint of the Proposed Development and should also result in enhancement of the local site ecology. The potential effects of the Proposed Development on ecological receptors have been assessed and it is concluded that with the implementation of appropriate mitigation measures the effects would be reduced to a minor adverse or neutral effect that would not adversely affect the ecological integrity of the site and the wider area. A cumulative impact assessment was undertaken with no significant impact concluded.
- 2.113.

Areas of Outstanding Natural Beauty

- 2.114. Policy NH6 sets out planning policy in relation to projects in Areas of Outstanding Natural Beauty (AONB). Planning permission for new development within an AONB will only be granted where it is of an appropriate design, size and scale for the locality and criteria are met, including: a) the siting and scale of the proposal is sympathetic to the special character of the AONB in general and of the particular locality; and b) it respects or conserves features (including buildings and other man-made features) of importance to the character, appearance or heritage of the landscape.
- 2.115. **Assessment:** A small area of the Proposed Development is located in the Antrim Coast and Glens Area of Outstanding Natural Beauty (AONB). Accordingly, Policy NH6 - Areas of Outstanding Natural Beauty is applicable. Development proposed within the area of the site that lies within the AONB boundary consists of approximately 775m of new site track, with no turbines or other infrastructure located within the AONB.
- 2.116. Chapter 4 of this ES assesses the impact of the project on the Antrim Coast and Glens AONB. Consistent with the SPPS' cautious approach to protected landscapes (para 6.223) and the BPG (para 1.3.23), every effort in siting and design has been made to reduce the impact of the Proposed Development and aid integration into the local landscape.
- 2.117. Although 775m of new access track would be located within the AONB boundary, the majority of the site including all the proposed turbines are outside the boundary of the Antrim Coast and Glens AONB. There is a pattern of wind farm clusters located along the western edge of this AONB. The extent of its visibility from within the AONB would be relatively limited with limited cumulative effects.
- 2.118. The Causeway Coast and Glens AONB is located approximately 22 km - 30 km to the north of the Proposed Development and is unlikely to experience any significant effects from the Proposed Development due to distance.
- 2.119. In relation to cumulative effects the overall magnitude of cumulative effects on landscape character is deemed to be of low magnitude and not significant and this is due to the existing character of the site and immediate surroundings which are already largely characterised by a number of man-made influences.
- 2.120. The LVIA concludes that the Proposed Development would have no significant effects on landscape character and is acceptable in landscape and visual terms. Therefore the landscape and visual impact of the Proposed Development is not unacceptably adverse for the purposes Policy NH6 or for the SPPS or Policy RE1 of PPS18 because the inherent characteristics of the landscape provide the capacity to absorb it.

Planning Policy Statement 3 - Access, Movement and Parking

- 2.121. PPS3 is retained policy for the purposes of the SPPS transitional arrangements. There is considered to be no conflict with the equivalent provisions in the SPPS,

- therefore until the Council adopts its Plan Strategy, its provisions will apply, together with the SPPS, with no less weight attached to the retained policy.
- 2.122. SPPS policy on Transportation is set out on pages 106 to 110. It consolidates and restates policy set out in PPS3 and PPS13. The Minister did not identify any conflicts or clarifications in his statement launching the SPPS. The principal focus of this section is, therefore, on PPS3.
- 2.123. PPS 3 (NI Planning Service, 2005) states that the orderly and effective implementation of the local development plan objectives requires provision of infrastructure and facilities, which include an adequate public road and transport network. Also the potential impact that a development may have on the efficiency of the public road network or on road safety is an important material consideration.
- 2.124. Policy AMP2 Access to Public Roads states:
'Planning permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access, onto a public road where such access will not prejudice road safety or significantly inconvenience the flow of traffic.'
- 2.125. **Assessment:** Chapter 12 of this ES assesses the impact of the Proposed Development on the receiving road network and considers the potential impacts on traffic and transport associated with the construction, operation and decommissioning phases of the Proposed Development. Taking into account the existing vehicle numbers, it is considered that there will be no significant impacts on the road network subject to appropriate mitigation in the form of a Traffic Management Plan which can be secured via a planning condition on any planning permission.
- 2.126. The Proposed Development therefore complies with the relevant policies in the SPPS and PPS3.

Planning Policy Statement 6 - Planning, Archaeology and the Built Heritage

- 2.127. PPS6 is retained policy for the purposes of the SPPS transition arrangements. There is considered to be no conflict with the equivalent provisions in the SPPS, therefore until the Council adopts its Plan Strategy, its provisions will apply, together with the SPPS, with no less weight attached to the retained policy.
- 2.128. SPPS policy on Archaeology and Built Heritage is set out on pages 37 to 44. It consolidates and restates policy set out in PPS6. The Minister did not identify any conflicts or clarifications in his statement launching the SPPS. The principal focus of this section is, therefore, on PPS6.
- 2.129. PPS 6 (NI Planning Service, 1999) sets out the Department's planning policies for the protection and conservation of archaeological remains and features of the built heritage. Archaeological sites and monuments, whether scheduled or otherwise, and their settings is a material consideration due to the desire to preserve these

- features. The contents of PPS 6 will be taken into account when preparing development plans and will be considered when determining planning applications.
- 2.130. Policy BH 1 of PPS 6 states the following:
'Development which would adversely affect such sites of regional importance or the integrity of their settings will not be permitted unless there are exceptional circumstances.'
- 2.131. And Policy BH 2 states:
"Development proposals which would adversely affect archaeological sites or monuments which are of local importance or their settings will only be permitted where the Department considers the importance of the proposed development or other material considerations outweigh the value of the remains in question."
- 2.132. Policy BH 3 states:
'Where the impact of a development proposal on important archaeological remains is unclear, or the relative importance of such remains is uncertain, the Department will normally require developers to provide further information in the form of an archaeological assessment or an archaeological evaluation.'
- 2.133. Policy BH 4 states:
'Where it is decided to grant planning permission for development which will affect sites known to contain archaeological remains, the Department will impose conditions to ensure that appropriate measures are taken for the identification and mitigation of archaeological impacts of the development...'
- 2.134. Policy BH6 states:
'The department will not normally permit development which would lead to the loss of, or cause harm to, the character, principal components or setting of parks, gardens and demesnes of special historic interest. Where planning permission is granted this will normally be conditional on the recording of any features of interest which will be lost before development commences.'
- 2.135. Policy BH11 states:
- 'The department will not normally permit development which would adversely affect the setting of a listed building. Development proposals will normally only be considered appropriate where all the following criteria are met:
 - The detailed design respects the listed building in terms of scale, height, massing and alignment;
 - The works proposed make use of traditional or sympathetic building materials and techniques which respect those found on the building; and
 - The nature of the use proposed respects the character of the setting of the building.'
- 2.136. PPS6 paragraph 2.6 states that development plans, where appropriate, will designate areas of significant archaeological interest (ASAs). Such designations

seek to identify particularly distinctive areas of the historic landscape in Northern Ireland. They are likely to include a number of individual and related sites and monuments and may also be distinguished by their landscape character and topography. Local policies or proposals for the protection of the overall character and integrity of these distinctive areas will normally be included in development plans.

- 2.137. **Assessment:** Chapter 5 of the ES considers the potential effects the Proposed Development would have on the historic environment. The assessment concluded that direct effects of negligible significance are predicted upon two heritage assets within the inner study area: HA8 and HA12 with a direct effect of minor significance predicted on HA13. It is recommended that all heritage assets within the ISA are fenced off with a suitable buffer throughout construction to prevent accidental damage.
- 2.138. Any direct effect upon archaeological remains discovered during the construction phase is unlikely to be of greater than minor significance. Construction phase setting effects would be temporary and are not considered to be significant in EIA due to their very short duration. A residual effect of minor significance, which is not significant in EIA terms, is predicted on the setting of ANT 022:012 Ballymacaldrack, 'Dooley's Cairn', court tomb throughout the operation of the Proposed Development.
- 2.139. Cumulative impact assessment, considering all other operational, consented and submitted applications for wind farms in the vicinity has identified no significant effects in EIA terms as a result of the Proposed Development and no direct residual decommissioning effects have been identified. On decommissioning the operational effects of minor significance on ANT 022:012 Ballymacaldrack, 'Dooley's Cairn' court tomb would be reversed.
- 2.140. No significant effects arising from the Proposed Development are predicted and the Proposed Development complies with the relevant policies in the SPPS, PPS6 and PPS18.

Planning Policy Statement 10 - Telecommunications

- 2.141. PPS10 is retained policy for the purposes of the SPPS transition arrangements. There is considered to be no conflict with the equivalent provisions in the SPPS, therefore until the Council adopts its Plan Strategy, its provisions will apply, together with the SPPS, with no less weight attached to the retained policy.
- 2.142. SPPS policy on Telecommunications and Other Utilities is set out on pages 94 to 96. It consolidates and restates policy set out in PPS10. The Minister did not identify any conflicts or clarifications in his statement launching the SPPS. The principal focus of this section is, therefore, on PPS10.
- 2.143. PPS 10 (NI Planning Service, 2002) states that large, prominent structures such as wind turbines can cause disruption to analogue television services by obstructing

- or reflecting the wanted signals. Policy TEL2 Development and Interference with Television Broadcasting services further states that:
- 2.144. 'The Department may refuse planning permission for development proposals which would result in undue interference with terrestrial television broadcasting services.'
- 2.145. In its justification for this statement the Department advises that it:
'Will wish to be satisfied that the potential for interference has been fully taken into account in the siting and design of large and prominent buildings and structures, since it will be more difficult, costly and sometimes impossible to correct after the event. Developers of wind turbines and any other structure which by virtue of its size, height or finishes is likely to result in undue interference are therefore encouraged seek expert advice on this matter before submitting their proposals.'
- 2.146. It further states that:
'Only in extreme cases where there is evidence that no practical remedy exists to overcome or otherwise mitigate problems of undue interference would the Department be justified in refusing planning permission.'
- 2.147. Paragraph 6.35 of PPS10 states that:
'In any development, significant and irremediable interference with other electrical equipment of any kind can be a material planning consideration. Electromagnetic interference may be caused by a radio transmitter or by unwanted signals emitted by other electrical equipment. The Radio communications Agency has statutory powers for dealing with this type of interference under the Wireless Telegraphy Act 1949 (see Annex B).
- 2.148. **Assessment:** Chapter 3 of this ES presents a range of considerations that have been taken into account in the design of the Proposed Development including telecommunications and interference. Should interference to television reception occur as a result of Proposed Development, a range of mitigation measures will be considered, with the most suitable method chosen on a case by case basis. Any necessary work would be undertaken in a timely manner following receipt of a valid complaint and would be funded by the wind farm operator.
- 2.149. RES has also consulted with organisations operating microwave links which could be affected by the Proposed Development. The proposed turbines could potentially impact two UHF scanning telemetry links operated by SONI which carry telemetry data from the Gruig Wind Farm substation. If the Proposed Development is consented, RES would agree a scheme of mitigation with the planning authority, the link operator (Vodafone) and provider, to be implemented prior to erection of turbines, and would be funded by the wind farm operator.

Planning Policy Statement 15 (Revised) - Planning and Flood Risk

- 2.150. PPS15 is retained policy for the purposes of the SPPS transition arrangements. There is considered to be no conflict with the equivalent provisions in the SPPS,

- therefore until the Council adopts its Plan Strategy, its provisions will apply, together with the SPPS, with no less weight attached to the retained policy.
- 2.151. SPPS policy on Flood Risk is set out on pages 61 to 68. It consolidates and restates policy set out in PPS15. The Minister did not identify any conflicts or clarifications in his statement launching the SPPS. The principal focus of this section is, therefore, on PPS15.
- 2.152. Revised PPS15 was published in September 2014 and contains policies relevant to the development of any proposal site in relation to flood risk:
- 2.153. Policy FLD 3 states:
'Beyond coastal flood plains and the flood plains of rivers the Department will not permit development which is known to be at risk from flooding, or which would be likely to increase the risk of flooding elsewhere. An exception to this policy will only be permitted where an application is accompanied by measures to mitigate the risk of flooding and it is demonstrated that such measures will not increase flood risk elsewhere, will not result in an adverse impact on visual amenity or the character of the local landscape; and will not result in an adverse impact on features of importance to nature conservation, archaeology or the built heritage.'
- 2.154. **Assessment:** Chapter 10 of this ES assesses the impact of the Proposed Development from hydrological and hydrogeological perspective. The hydrological and hydrogeological setting of the site for the purposes of the assessment is the downstream Cloghmills Water, Killagan Water, and Bush River as identified in Chapter 10.
- 2.155. Aspects of the design, construction and operation of the Proposed Development that may potentially impact on the receiving geological and water environment have been identified and the pathways for impacts assessed. This has determined the mitigation methods required to prevent any significant adverse impacts.
- 2.156. Mitigation integrated as part of outline design and proposed during the construction phase includes the avoidance of water features based on baseline constraints mapping; design of site elements to minimise impact on the geological and water environment; implementation of a comprehensive surface water management plan comprising the use of SuDS (drainage) and silt management in order to prevent pathways for pollution; and construction phase pollution prevention procedures in accordance with NIEA requirements and guidance.
- 2.157. Monitoring of the effect of the Proposed Development on the water environment and fisheries habitat will be provided by the Applicant through physicochemical and biological water quality monitoring. Implementation of the mitigation measures eliminates or reduces the potential significance to all receptors to not significant. There is no likelihood of significant cumulative impacts over and above any pre-existing effect caused by existing or consented wind farm development. The Proposed Development therefore complies with PPS15 (Revised).

Planning Policy Statement 16 - Tourism

- 2.158. PPS16 is retained policy for the purposes of the SPPS transition arrangements. There is considered to be no conflict with the equivalent provisions in the SPPS, therefore until the Council adopts its Plan Strategy, its provisions will apply, together with the SPPS, with no less weight attached to the retained policy.
- 2.159. SPPS policy on Tourism is set out on pages 97 to 100. It consolidates and restates policy set out in PPS16. The Minister did not identify any conflicts or clarifications in his statement launching the SPPS. The principal focus of this section is, therefore, on PPS16.
- 2.160. PPS 16 was published in June 2013. This statement sets out the Department's planning policy for tourism development and also for the safeguarding of tourism assets. It seeks to facilitate economic growth and social well-being through tourism in ways which are sustainable and compatible with environmental welfare and the conservation of important environmental assets. It embodies the Government's commitment to sustainable development and to the conservation of biodiversity.
- 2.161. The objectives of PPS16 are to:
- Facilitate sustainable tourism development in an environmentally sensitive manner;
 - Contribute to the growth of the regional economy by facilitating tourism growth;
 - Safeguard tourism assets from inappropriate development;
 - Utilise and develop the tourism potential of settlements by facilitating tourism development of an appropriate nature, location and scale;
 - Sustain a vibrant rural community by supporting tourism development of an appropriate nature, location and scale in rural areas; and
 - Ensure a high standard of quality and design for all tourism development.
- 2.162. Policy TSM 8 sets out the criteria for the safeguarding of tourism assets. It indicates that planning permission will not be granted for development that would in itself or in combination with existing and approved development in the locality have an adverse impact on a tourism asset such as to significantly compromise its tourism value.
- 2.163. **Assessment:** The information within this ES assesses the impact of the proposals on the receiving environment, considering its visibility and connection to tourist assets within the study area.
- 2.164. Paragraph 1.3.80 of the Best Practice Guidance refers to wind energy development not necessarily being incompatible with tourism and leisure interests.
- 2.165. Having regard to the conclusions of Chapters 4 & 5 in respect of landscape/visual impact and cultural heritage insofar as both of these considerations contribute to the area's tourism assets and on the basis that the proposal would not deter visitors

from utilising the tourism assets in the area, it is concluded that the Proposed Development complies with Policy TSM8 of PPS16.

Planning Policy Statement 18 - Renewable Energy

- 2.166. PPS18 is retained policy for the purposes of the SPPS transitional arrangements. There is considered to be conflict with the equivalent provisions in the SPPS, only insofar as the SPPS changes the direction to attach 'significant' weight to the benefits associated with renewable energy projects and provides the decision maker with discretion in deciding the 'appropriate' amount of weight to be attached to the benefits. This is set out above at paragraph 2.80. Therefore, until the Council adopts its Plan Strategy, in terms of the 'weighting direction' the provisions of the SPPS apply, with less weight being attached to the retained policy. In all other respects, it is anticipated that no less weight will be attached to the retained policy in PPS18 Policy RE1.
- 2.167. PPS18, of August 2009, is the key planning policy for renewable energy in Northern Ireland. Paragraph 3.1 of PPS18 states that its aim is to facilitate the siting of renewable energy generating facilities in appropriate locations to achieve Northern Ireland's renewable energy targets and to realise the benefits of renewable energy. This is a permissive policy context. In a speech on 2nd September 2009 to the Irish Wind Energy Association (IWEA) the Minister of the Environment stated "nothing illustrates the promotive nature of PPS18 more so than the opening up of AONB's to wind energy development for the first time. This is in stark contrast to the previous policy where there was a general presumption against wind farm development in AONB's".
- 2.168. Within this permissive policy context PPS18 sets out the Department's objectives relevant to renewable energy and its proposed planning policies that will help deliver these objectives.
- 2.169. The applicable policy objectives of PPS18 are:
- to ensure that the environmental, landscape, visual and amenity impacts associated with or arising from renewable energy development are adequately addressed; and
 - to ensure adequate protection of the Region's built and natural, and cultural heritage features.
- 2.170. Policy RE 1 - Renewable Energy Development sets out a presumption in favour of renewable energy development provided it will not result in unacceptable adverse impact on five criteria. These include criteria around the need to protect and conserve the environment, visual amenity, human health and residential amenity, and public access to the countryside.
- 2.171. The policy specifically adopts a mitigation/compensation led approach and emphasises the 'significant' weight to be attached to the wider benefits of renewable energy projects. Paragraph 4.1 of the justification and amplification states that:

- ‘Where any project is likely to result in unavoidable damage during its installation, operation or decommissioning, the application will need to indicate how this will be minimised and mitigated, including details of any proposed compensatory measures, such as a habitat management plan or the creation of a new habitat.’
- 2.172. The wider environmental, economic and social benefits of all proposals for renewable energy projects are material considerations that will be given significant weight in determining whether planning permission should be granted.
- 2.173. This direction on where significant weight should be attached in the balancing exercise required by the policy is probably unique in the UK and Ireland and must be rooted in the Executive’s agenda for renewable energy. The policy goes on to establish a set of seven additional criteria specifically for wind energy proposals including protection of visual amenity, consideration of cumulative impact, landslide risk, electromagnetic interference, roads, and residential amenity. The overall wording and thrust of the policy suggests that some degree of adverse impact may be acceptable.
- 2.174. The policy also states that for wind farm development a separation distance of 10 times rotor diameter to occupied property, with a minimum distance not less than 500m, will generally apply. The policy note also advises that turbines should be set back at least fall over distance plus 10% from the edge of any public road; public right of way; or railway line so as to achieve maximum safety.
- 2.175. **Assessment:** The wider environmental, economic and social benefits (Chapter 14) of the proposal are identified of this ES. Retained policy in PPS18 Policy RE1 requires that significant weight is attached to these factors but since there is conflict with the SPPS, greater weight is to be attached to the equivalent provision in the SPPS. The equivalent provision in the SPPS states that ‘appropriate’ weight should be given to the benefits. Appropriate weight must be relative to the scale of the benefits. In this case the social, environmental and economic benefits of the project are large in scale, proportionate to the scale and significance of the project. It follows that when considering the appropriate weight to attach to the benefits, the decision maker should attach significant weight.
- 2.176. This approach is evident in the PAC’s consideration of the following appeals whereby the substantial environmental, economic and social benefits of the proposal were attributed significant weight (PAC Refs: 2012/A0070, 2015/A0102, 2015/A0168, 2015/A0169 and 2015/A200).
- 2.177. This ES demonstrates that there are limited adverse effects after mitigation.
- 2.178. Tested in the round, with the appropriate weighing of the benefits as still directed by the policy, the Proposed Development is considered to meet the requirements of the SPPS and PPS18.
- 2.179. Planning Appeals Commission interpretation in respect of the 10 rotor diameter distance is outlined in the following appeal cases PAC Refs: 2012/A0070, 2013/A0220, 2014/A0285, 2015/A0200, 2017/A0050, 2018/A0199 where in summary a degree of latitude can be applied to separation distances and the 10

- times rotor diameter need not rigidly be applied. This would reflect Policy RE1 of PPS18 which references that the consideration of the appropriate separation distances will 'generally' apply.
- 2.180. There are residential properties located on access roads that are located off Corkey Road (H6, H10, H11, H12, H13, H14, H16, H34, H164 & H165) within a distance of 10x the rotor diameter of the turbines, but generally towards the outer edge of this limit. The most proximate turbines in this location would be T1 & T2. The dwellings are located at a lower level from the turbines and due the nature of the intervening landscape, which rises quite steeply, there will be limited direct views of the turbines. Views will also primarily be from oblique angles. These factors will all contribute to minimising the impact on residential amenity of these properties.
- 2.181. There are residential properties located on Gruig Lane, off the Tullykittagh Road (H22, H45, H58, H168 & H173) within a distance of 10x the rotor diameter of the turbines, but generally towards the outer edge of this limit. The closest turbine would be T3. Again the land rises relatively steeply towards the turbine meaning visibility of the nearest turbine will be less direct due to this difference of levels. The dwellings are generally associated with farms and have a curtilage dominated by farm buildings. These factors will all contribute to minimising the impact on residential amenity of these properties.
- 2.182. H94 is located on a laneway off the Tullykittagh Road and has a relationship to T3 & T5, but is generally towards the outer edge of the 10x rotor diameter limit. The land rises to the front of the property and there is dense vegetation beyond the boundary of the property. The views from the property are not directly towards the Proposed Development. There are also outbuildings and vegetation within the wider curtilage of the property and pockets of vegetation in the surrounding landscape. This will serve to minimise the impact of the development on residential amenity.
- 2.183. There is one residential property on Omerbane Road (H52) within a distance of 10x the rotor diameter of the turbines, but on the extreme edge of this limit. The property fronts onto the road with long established site boundaries and outbuildings around the curtilage of the property. That land form rises gradually but quite steeply to the rear of the property, due to its proximity to the Slieverush landform. The most proximate turbine within the Proposed Development would be T5 however given the features described above, it will not experience any significant impact on residential amenity as a result of the Proposed Development.
- 2.184. There are four properties on Skerry West Road (H27, H49, H209 & H224) within a distance of 10x the rotor diameter of the turbines, but generally towards the outer edge of this limit. The land is relatively flat in the intervening area between the nearest turbines (T5 & T6) but does fall away towards the turbine locations. H27, H209 & H224 are surrounded by mature boundary vegetation which will mitigate their appreciation of the turbines from within the curtilage and result in no impact to the residential amenity. H49 has a number of tall trees around the perimeter of

the property and within the area between the house and the road. The property does not front the road and due to the road alignment, the site is not directly orientated towards the Proposed Development, rather it is orientated towards Slieverush and has extensive elevated views in a southerly direction. Therefore, it is considered that the impact on residential amenity from the Proposed Development will be limited.

- 2.185. There are two residential properties on Old Cushendun Road (H222 & H33) within a distance of 10x the rotor diameter of the turbines but on the extreme edge of the limit. The properties are located close to the public road and in the foothills of the nearby Skerry Hill which forms a back drop to the properties. Such is the nature of the rising landform of Skerry Hill, it will obscure the presence of the Proposed Development meaning it will have no impact on residential amenity for these properties
- 2.186. No turbines are located within fall distance of any roads. In relation to public roads and overhead electricity lines, buffers were applied to nearby public roads in line with the Best Practice Guidance to PPS18 which recommends a setback distance of at least tip height plus 10% between turbines and roads. In keeping with the Energy Networks Association (ENA) L44 Issue 1 dated 2012 "Separation of Wind Turbines- Principles of Good Practice" a buffer of tip height plus %10 was applied to a 33kV overhead line crossing the Site.
- 2.187. The Proposed Development is therefore considered to meet the requirements of Policy RE1 in this regard.

PPS18 Best Practice Guidance (BPG)

- 2.188. PPS18 BPG is to continue to be treated as a material consideration during the transitional (or after) as per paragraph 1.14 of the SPPS.
- 2.189. The guidance document (NI Planning Service, 2009b) provides background information on a variety of renewable energy technologies and is intended to be read in conjunction with PPS 18. Section 1 is specific to wind energy. Paragraph 1.3.4 of the guidance document states that "Each planning application will be considered on its own merits, and the argument that granting permission might lead to another application will not be sufficient grounds for refusal."
- 2.190. The guidance document (NI Planning Service, 2009b) provides background information on a variety of renewable energy technologies and is intended to be read in conjunction with PPS 18.
- 2.191. The guidance document further details the issues relevant to planning applications for onshore wind energy. These include nature conservation, landscape and visual impact, hydrology and geology, archaeology and built heritage, noise, aviation, and health and safety issues (e.g. public access, shadow flicker and ice throw).
- 2.192. **Assessment:** The policy assessment in relation to PPS18 has had regard to the guidance contained within the BPG as evident in Chapter 4.

Wind Energy Development in Northern Ireland's Landscapes - Supplementary Planning Guidance (SPG)

- 2.193. This SPG is to continue to be treated as a material consideration during the transitionary (or after) as per paragraph 1.14 of the SPPS.
- 2.194. The SPG (NIEA, 2010) sets out the background to Northern Ireland's landscapes, describes the approach and general principles that should be applied to potential wind energy developments, and it provides guidance related to specific sensitivity of each of the 130 Landscape Character Areas (LCAs) in Northern Ireland to wind energy development. It is intended to help developers in identifying appropriate sites for wind energy generation.
- 2.195. **Assessment:** The SPG has been taken into account in the assessment of landscape and visual impact in Chapter 4.

Planning Policy Statement 21 - Sustainable Development in the Countryside

- 2.196. PPS21 is retained policy for the purposes of the SPPS transitionary arrangements. Although referred to in the Minister's statement launching the SPPS, as far as renewable energy proposals are concerned there is considered to be no conflict with the equivalent provisions in the SPPS. Therefore until the Council adopts its Plan Strategy, the renewable energy related provisions of PPS21 will apply, together with the SPPS, with no less weight attached to the retained policy.
- 2.197. The aim of PPS 21 (NI Planning Service, 2010) is to manage development in the countryside in a manner consistent with achieving the strategic objectives of the Regional Development Strategy for Northern Ireland, which also strikes a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities.
- 2.198. Policy CTY 1 (Development in the Countryside) states that there are a range of types of development which in principle are considered to be acceptable in the countryside and that will contribute to the aims of sustainable development. Non-residential developments such as renewable energy projects are considered an acceptable type of development when they are in accordance with PPS 18.
- 2.199. **Assessment:** On the basis that the proposals meet the requirements of PPS18, the project is also acceptable in respect of PPS21.

Local Policy Context

- 2.200. Section 6(4) of the Planning Act (NI) 2011 (the Act) requires that the determination of proposals must be in accordance with the prevailing local development plan unless material considerations indicate otherwise.
- 2.201. Section 45(1) of the Act provides meaning on the weight to be afforded to the plan in determining planning applications subject to this part and section 91(2); 'Where an application is made for planning permission, the Council, or as the case may be, the Department, in dealing with the application must have regard to the local

development plan, so far as material to the application, and to any other material considerations.'

- 2.202. Eleven of the proposed turbines fall within the Causeway Coast and Glens Borough Council Area, with one turbine falling within the Mid and East Antrim Brough Council Boundary. The following Local Plans are of relevance.

Ballymena Area Plan (BAP) 1986-2001

- 2.203. The purpose of the Ballymena Area Plan is to set out the broad land use framework for the physical development of the district. It aims to create urban and rural environments which will make a positive contribution to an improvement in the quality of life in the Borough. Whilst significantly dated (published in November 1989) it remains the extant plan for the area. References to applicable policy are outlined below with relevant references to those superseded by strategic policy direction where relevant.
- 2.204. A small area of the application site to the south west falls within the plan boundary but is not subject to any zoning or designation.

Northern Area Plan (NAP) 2016

- 2.205. The purpose of the Northern Area Plan 2016 is to inform the general public, statutory authorities, developers and other interested parties of the policy framework and land use proposals that will be used to guide development decisions within the Plan area over the period of the Plan.
- 2.206. The application site falls outside of any defined settlements in the Plan and as such falls within the countryside. The Development falls within:
- An Area of Outstanding Natural Beauty (Antrim Coast and Glens) (in so far as set out above under the consideration against PPS2 Policy NH6.
 - A Site of Local Nature Conservation Importance (Aghenagerragh River Bog)
- 2.207. A detailed assessment of the Aghenagerragh River Bog SLNCl is contained within the Countryside Assessment Technical Supplement of the NAP. This classifies the the Aghenagerragh River Bog as a blanket bog with dry heath dominated by Heather Crowberry with some Bell Heather and Cross-leaved Heath on the upper part of the site. Cottongrasses are abundant with Bog Asphodel and Carnation Sedge in wetter areas. The lower slopes are dominated by grasses with occasional acid flushes.
- 2.208. Policy for the control of development within SLNCl is contained in Policy ENV 2 of the NAP which states that planning permission will not be not be granted for development that would be liable to have a significant adverse effect on the intrinsic nature conservation interest of a designated SLNCl. Exceptionally, where development is permitted which might significantly adversely affect the intrinsic nature conservation interest, adverse effects should be kept to a minimum and appropriate mitigation measures implemented. Planning permission, where granted, will be subject to conditions to guide developers on the necessary compensation measures such as the provision of new or enhanced habitats or

features or for improved management. Where appropriate, developers may be asked to enter into a Planning Agreement to secure these outcomes.

- 2.209. The impact of the Proposed Development on the Aghenagerragh River Bog SLNCI has been considered in Chapters 6 and 7 of this ES. The potential effects of the Development on ecological receptors have been assessed and it is concluded that with the implementation of appropriate mitigation measures the effects would be reduced to a minor adverse or neutral effect and therefore would not adversely affect the ecological integrity of the site and the wider area. An assessment of cumulative impacts on the habitats was also undertaken, and it was concluded that this is not significant impact.
- 2.210. The NAP contains no specific renewable energy policies.

Emerging Local Development Plans

- 2.211. Causeway Coast and Glens Borough Council have not yet published their draft Plan Strategy for consultation. Publication is estimated to be in Q3/Q4 of 2022.
- 2.212. Mid and East Antrim Borough Council has prepared a timetable for the preparation of its Local Development Plan (LDP) for the Borough up to 2030 and published its Mid and East Antrim Borough Council Local Development Plan 2030 draft Plan Strategy (dPS) in September 2019. The Independent Examination into the Plan, which will be the forum under which the plan will be assessed in terms of its soundness, has commenced and is due to conclude in early Autumn.
- 2.213. The dPS contains several policies which, directly and indirectly control the feasibility, viability and location of renewable energy infrastructure and particularly wind turbines. These policies are:
- Draft Policy CS1 - Sustainable development in the Countryside (cross refers to Draft Policy RE1)
 - Draft Policy CS2 - Special Countryside Areas
 - Draft Policy CS3 - Areas of Constraint on High Structures
 - Draft Policy CS5 - Antrim Coast and Glens Area of Outstanding Natural Beauty
 - Draft Policy RE1 - Renewable Energy Development; and
 - Draft Policy TOC1 - Telecommunications Development and Overhead Cables
- 2.214. The above policies have been the subject of objections and it cannot be assumed such policies will be carried forward to an adopted Plan Strategy. Indeed, as set out above, the plan has yet to be independently examined against the tests of soundness or found sound, as required under Section 10 (6) of the 2011 Act.
- 2.215. The SPPS is clear in setting out the transitional arrangements, in that a transition period will operate until the adoption of a Plan Strategy. Therefore, until the adoption of the Plan Strategy for the relevant council areas the planning authority (in this case DfI) will apply existing regional policies and those contained in the SPPS.

- 2.216. The SPPS at para 5.73 considers that proposals should only be refused on the basis of prematurity where:
- ‘...development proposals which are individually so substantial, or whose cumulative effect would be so significant, that to grant planning permission would prejudice the outcome of the plan process by predetermining decisions about the scale, location or phasing of new development with out to be taken in the LDP context....’
- 2.217. Guidance on weight to be afforded to the provisions of an emerging development plan is also set out in the Joint Ministerial Statement 2005 (JMS) which remains a relevant consideration. Whilst the JMS is still material, the contents of the SPPS would be afforded greater weight, where there is conflict identified. In this instance there is no direct conflict with the SPPS. It is our view that the Proposed Development would not prejudice the delivery of policies within the emerging Plan Strategy as it:
- would not prejudice the ability of the Plan Strategy to retain conformity with the RDS
 - would not result in an adverse impact on an environmental asset, as demonstrated within this ES;
 - would not undermine the rationale behind a proposed Special Countryside Area designation proposed in the emerging plan as the draft policies make provision for exceptions.
- 2.218. Furthermore, the SPPS is clear at paragraph 6.221 that “moratoria on applications for renewable energy development whilst LDPs are being prepared or updated are not appropriate”. For this reason, the Proposed Development can be determined under existing regional policies and the SPPS.
- 2.219. **Assessment:** Most aspects of local planning policy have been superseded by subsequent regional planning policy. On the basis of the conclusions of the detailed assessments within this ES, there is no conflict with applicable local planning policy.

Other Guidance

Antrim Coast and Glens Area of Outstanding Natural Beauty Management Plan 2008 - 2018

- 2.220. The Antrim Coast and Glens AONB Management Group, in partnership with the Causeway Coast and Glens Heritage Trust produced a management plan for the AONB. The Management Plan helps everyone with a stake in the landscape respond in ways that enhance the landscape and ensure the AONB remains an area everybody can identify with and enjoy and allow it to continue contributing crucially to the economy of the area.
- 2.221. The management plan covers a 10-year period and is accompanied by an Action Plan which details how the goals will be attained. The Management Plan and Five

Year Action Plan were published for the period 2008 -2018. The purpose of the Management Plan is to state what elements of the AONB are special, characteristic and valued and to devise objectives and mechanisms by which change can occur whilst maintaining the intrinsic character of area.

- 2.222. The Management Plan identifies a number of objectives around the themes of land, coast and sea - biodiversity, geodiversity and landscape; built heritage - the built and historic environments; and sustainable communities - community, planning, the economy and tourism.
- 2.223. The Five Year Action Plan that accompanies the AONB Management Plan provides some additional detail as to how Objectives will be achieved. In relation to the management objective of protecting landscape and seascape character and restoring key areas of visual prominence where they are currently degraded the Action Plan refers to existing planning policy, guidance and landscape character assessments for information.

Overall Policy Compliance

- 2.224. Making an energy infrastructure contribution of the scale proposed (50.4 MW) will assist in the achievement of strategic energy targets and objectives, consistent with a wide range of International, European, UK and Regional level priorities. The rationale for the project in relation to the delivery of renewable is clear.
- 2.225. There is a strategic qualified national presumption in favour of developing renewable energy projects of this type.
- 2.226. The established approach to decision making advocated in policy is to balance the wider environmental, economic and social benefits of the project against the environmental impacts, attaching significant weight to the former.
- 2.227. The SPPS changes this approach insofar as the PPS18 direction to attach significant weight to the benefits is replaced by a discretion for the decision maker to determine the appropriate weight to be attached to the benefits. This must mean that the large scale social, environmental and economic benefits associated with this project are attached significant weight. In weighing the acceptance of the proposals the following must be considered:
- The proposal will offer job creation and economic activity to the regional economy providing catalytic benefits to investment within Northern Ireland.
 - Given the 35 year lifetime of the development it is expected that direct operational impacts equate to 35 job years, £1.27m million direct wages and £9.37 million of direct Gross Value Added over the operational phase.
 - Both the construction and operational phases will generate increased tax and business rates revenue and the proposal is estimated to involve a capital spend of £64.9 million.

- Based on rateable values of £7,100 per MW— it is calculated that the Proposed Development will increase rateable value by £0.4 million each year, or by £12.52 million over the project life.
 - The amount of electricity that could be produced by the Proposed Development is estimated at 206.4gWh per year which is equivalent to the needs of 54,800 homes each year, or approximately 80 percent of the current housing stock in Causeway Coast & Glens Borough Council area.
 - The Proposed Development is also estimated to reduce CO₂ emissions by 90,800 tonnes each year when compared against equivalent non-renewable sources.
- 2.228. The landscape and visual impact of the windfarm is not unacceptably adverse for the purposes of the SPPS and PPS18 Policy RE1 because the inherent characteristics of the landscape provide the capacity to absorb it. The effects - relative to the qualities that underpin the designation - would not undermine the overall AONB or compromise wider landscape and visual amenity to an unacceptable degree.
- 2.229. With the discretion to attach significant weight to the wider environmental, economic and social benefits arising from the proposal, and having regard to how the project demonstrates that it will have limited adverse impacts, the project is considered to comply with relevant planning policy because there are no unacceptable adverse effects which are not outweighed by the local and wider environmental, economic and social benefits of the Proposed Development.

References

Department for Regional Development (NI) (DRD) Regional Development Strategy 2035 (March 2012)

Department of the Environment (NI) (DoE) A Strategic Planning Policy Statement for Northern Ireland Planning for Sustainable Development (SPPS)

Department of the Environment (NI) (DoE) Best Practice Guidance to Planning Policy Statement 18: Renewable Energy (BPG, PPS18), (August 2009)

Department of the Environment (NI) (DoE) Larne Area Plan 2010

Department of the Environment (NI) (DoE) Planning Policy Statement 2: Natural Heritage (PPS2), (July 2013)

Department of the Environment (NI) (DoE) Planning Policy Statement 3: Access, Movement and Parking (PPS3), (February 2005)

Department of the Environment (NI) (DoE) Planning Policy Statement 6: Planning, Archaeology and The Built Heritage (PPS6), (March 1999)

Department of the Environment (NI) (DoE) Planning Policy Statement 10: Planning & Telecommunications (PPS10), (April 2002)

Department of the Environment (NI) (DoE) Planning Policy Statement 15: Planning and Flood Risk (PPS15), (September 2014)

Department of the Environment (NI) (DoE) Planning Policy Statement 16: Tourism (PPS16), (June 2013)

Department of the Environment (NI) (DoE) Planning Policy Statement 18: Renewable Energy (PPS18), (August 2009)

Department of the Environment (NI) (DoE) Planning Policy Statement 21: Sustainable Development in the Countryside (PPS21), (June 2010)

Department of the Environment (NI) (DoE) Supplementary Planning Guidance: Wind Energy Development in Northern Ireland's Landscapes (SPG), (August 2010)

Causeway Coast & Glens Heritage Trust - Antrim Coast and Glens Area of Outstanding Natural Beauty Management Plan 2008 - 2018 (2008)

Mid and East Antrim Borough Council - Mid and East Antrim Borough Council Local Development Plan 2030 draft Plan Strategy (September 2019)

Joint Ministerial Statement - Development Plans and Implementation of the Regional Development Strategy (January 2005)