



**Unique Reference Number:** SONI-C2-35  
**Submission:**  
Ulster Wildlife Response to SONI public consultation June 2021

**Author:** Ulster Wildlife  
**Date Created:** 13.06.2021 - 7:44pm

**Consultation:**  
Public Consultation: Shaping our Electricity Future

**Status:** Submitted  
**Date Submitted:** 13.06.2021 - 8:34pm

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## Cover Letter

Ulster Wildlife is Northern Ireland's largest local nature conservation charity with over 14,000 members. Our vision is for a healthy, well-cared for natural environment which contributes to enjoyment, quality of life, prosperity, health and well-being. Ulster Wildlife supports strong action to tackle the climate emergency and that targets to significantly increase energy production via renewables are vital in reducing our greenhouse gas emissions. We also recognise climate change itself has and will have a huge impact upon NI's wildlife, as well as on human health and wellbeing - the twin climate and biodiversity crises are intrinsically linked and both affect human health. We would like to ensure that there is appropriate consideration when finalising the options for future grid infrastructure to Northern Ireland's wildlife- habitats and species- and that core principles are upheld in order to minimise impact and mitigate impacts on wildlife where necessary. This must also incorporate future-proofing: recognising the role many habitats have in sequestering carbon (an 'ecosystem service' which must play a vital role also in tackling our greenhouse gas emissions - also known as a 'Nature-based Solution' to climate change) and in providing other services such as flood mitigation which will become increasingly important as the climate changes - and also enabling wildlife itself to adapt to the changing climate.

The core principles we would like to see upheld in planning future infrastructure to support an ambitious renewables target are as follows:

1. Strong and inclusive decision making, with early dialogue between all stakeholders, supported by cross-cutting government policies;
2. Evidence and research to support transparent decision making - understanding the cumulative ecosystem-wide impacts of developments;
3. Good ecological management with appropriate mitigation and safeguarding of species and habitats of importance (e.g. at a local, national and international scale, recognising the importance of connectivity and the UK's target to achieve 30% of land and sea managed for nature by 2030), with a core commitment to the principle of net environmental gain and appropriate use of the precautionary principle;
4. Cross-border collaboration (UK and Republic of Ireland);
5. Establishment of partnerships that ensure integration of terrestrial and marine planning systems and that these are fully consulted in planning electricity infrastructure;
6. That all developments make environmental benefits clear in terms of contribution to renewables targets/reduction in GHG emissions (i.e. net carbon impact), and the risk of damage to ecosystems from the development proposed;

7. Collaborations are fostered to maximise environmental mitigation options and minimise environmental impacts, and where possible local/community scale energy schemes are enabled and repowering of existing wind farms undertaken to reduce the need for large wind/solar farms whether onshore or offshore.

## Observations:

### Lower number of projects and role of offshore wind

**Chapter:** Draft Approach 1: Generation-Led

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

Agree

Due to the lower number of proposed developments/projects we are assuming that this may reduce potential impact of wildlife and habitats, however Ulster Wildlife notes that this option makes a significant assumption of the role of offshore wind farms and we question feasibility, given that 2030 is only 8.5 years away and there are no offshore wind farms as far as we're aware in the pipeline - and the Department for the Economy's Energy Strategy consultation document notes the need for significant regulatory changes and financial incentives to encourage offshore wind developers. Ulster Wildlife does not oppose offshore renewables, and we recognise their huge potential in helping our society reach net zero greenhouse gas emissions, but as with onshore renewables we would expect careful consideration given to habitats and species, with avoidance of environmental impacts (and understanding of cumulative impacts) - and we recognise that there are still many unknowns in terms of impacts of underwater noise, vibration and electro-magnetic fields on marine life (whether commercial species such as Nephrops (Dublin Bay prawns), lobsters and crab, or species of conservation importance such as skate, harbour porpoise etc. just to name a couple). We also note that offshore wind farm developments are indicated off the east coast of Northern Ireland- a region that is very important for the Northern Ireland fishing and aquaculture industries- and also home to habitats that sequester nationally-significant amounts of carbon. As stated in our Cover Letter, Ulster Wildlife encourage early cross-sectoral dialogue and the use of spatial planning and cumulative impact assessments when considering sites for renewables projects.

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### Concerns regarding disruption and impacts to wildlife

**Chapter:** Draft approach 2: Developer-Led

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

Disagree

Ulster Wildlife are concerned that this is an approach which does not integrate land- and marine spatial planning and wider land/sea use, and could result in a far greater number of projects requiring significant amounts of cabling that will have a greater environmental impact. We are also concerned how dialogue will be fostered between developers to ensure there is some strategy to projects.

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### Uncertainty on timeframe

**Chapter:** Draft approach 3: Technology-Led

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

Neither agree nor disagree

Ulster Wildlife is concerned that given the commitment to reach 70% renewable energy by 2030 that reliance on technological developments may make it very challenging to meet this target, as it would require significant agility and flexibility over short time frames. We are also concerned research may be limited regarding the impacts of new technologies on the environment (e.g. habitats and species), especially longer-term and cumulative impacts.

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## Role of integrated policies

**Chapter:** Draft approach 4: Demand-Led

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

Neither agree nor disagree

Ulster Wildlife encourages the integration of government policies in order to meet ambitious greenhouse gas emissions reductions, but as yet we do not have a land use strategy or a marine spatial plan (the marine plan is only draft, and does not include a spatial element). If there is significant cross-sector collaboration to enable this approach, with appropriate consideration of cumulative environmental impacts and future-proofing (with a strong awareness of climate change adaptation- risks posed by climate change are understood and planned for), then this may involve fewer projects and the impact on land, sea, habitats and species is minimised.

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**Documents Attached:** No

**Boundaries Captured on Map:** No