SAVE THE MOAT • SAVE THE SPERRINS
Renewable Electricity Generation Bill
Written evidence on Bill 42/22–27 | 21st October 2026
Submitted by Save The Moat – Save The Sperrins

Our position

Save The Moat – Save The Sperrins is a grassroots group of residents from the Sperrins Area of Outstanding Natural Beauty (AONB) and the wider North West. We are not lawyers or energy industry specialists. We are people living alongside existing and proposed large-scale energy developments, concerned about the future of our mountains, rivers, peatlands and rural communities, and seeking meaningful participation in decisions with consequences lasting decades.
We oppose further onshore wind development in Northern Ireland as it currently stands and the way it is being pursued. The continued reliance on a developer-led, application-by-application approach, without an adopted, publicly accessible regional spatial strategy, live mapping and adequate consideration of cumulative environmental, landscape and community impacts, is unacceptable. We therefore oppose any new onshore wind project receiving financial support under the proposed Renewable Electricity Price Guarantee (REPG).

Furthermore, we believe that no new onshore wind developments should be permitted within Areas of Outstanding Natural Beauty (AONBs), or within Fermanagh and Omagh District Council, Causeway Coast and Glens Borough Council, Mid Ulster and Derry City and Strabane District Council. These areas should be protected from further industrial-scale wind development, regardless of any future spatial strategy or financial incentive scheme.

They are carrying the brunt of the onshore wind for the North and as a result Communtities and nature are carrying severe consequences. Our position is not conditional on a future spatial strategy, better mitigation or financial benefits being offered to local residents. We recognise statutory climate targets and the need to reduce reliance on fossil fuels, but we do not accept that generating renewable electricity alone justifies publicly supported environmental harm or additional financial risks for electricity consumers.

We ask the Committee to recommend substantive amendments before enabling further long-term financial support. Minimum safeguards, exclusions, public accountability and meaningful community participation should be established in primary legislation rather than being left substantially to future regulations.

1. No spatial strategy and a developer-led pattern of development.

Northern Ireland has regional planning policy, including the Strategic Planning Policy Statement (SPPS), but there is no adopted Northern Ireland-wide spatial strategy identifying where onshore wind development should and should not take place following a comprehensive, publicly accessible assessment of

cumulative environmental, landscape and community effects. The Department for Infrastructure considered a new spatial approach during the SPPS review, then removed it from the revised policy; its Strategic Environmental Assessment material records that decision. Regional planning policy is not equivalent to an adopted strategic spatial siting framework. There should also be live mapping of what is built and what is in planning, so that people can see live mapping and make proper informed decisions.

We believe Northern Ireland urgently needs a single, publicly accessible, regularly updated interactive map showing the full extent of existing and proposed renewable energy infrastructure. This should include operational wind farms and developments under construction, approved projects, applications awaiting determination and proposals at pre-application stage, alongside associated substations, grid connections, battery energy storage systems, data centres and access infrastructure. The map should show turbine locations, heights, development boundaries, designated landscapes, peatlands, priority habitats and relevant environmental constraints.

It should also allow residents, planning authorities and decision-makers to assess the combined effects of developments across council boundaries, rather than relying on disconnected planning applications and separate developer assessments. Information should be accurate, downloadable and updated throughout the planning and construction process. Without such mapping, communities cannot reasonably be expected to understand the cumulative scale of development or participate on an informed and equal basis in decisions affecting their homes and landscapes.
In our view, the fact all of this is missing, has left a developer-led, application-by-application process, with individual sites selected by commercial promoters and local communities expected to react to each proposal.

The resulting concentration of development, cumulative landscape change, peatland disturbance, grid infrastructure and impacts across council boundaries need to be examined together, not treated as isolated projects. A strategic assessment is necessary for accountable policymaking, but must not be represented as a route to obtaining our support for further onshore wind.

Department for the Economy figures for the year ending June 2026 show that wind accounted for 74% of Northern Ireland's renewable electricity generation. We question whether this represents a genuinely diverse renewable energy strategy, particularly when further financial incentives appear designed, at least in part, to bring forward projects already in developers' pipelines. Rather than continuing to incentivise additional onshore wind development, we believe the priority should be to address the shortcomings of the existing renewable energy system, including grid constraints, renewable electricity curtailment, inadequate

infrastructure, energy inefficiency and the failure to fully utilise electricity already being generated.

Greater emphasis must be placed on reducing electricity demand, improving energy efficiency, upgrading the grid and protecting consumers from unnecessary costs. We also strongly oppose further AI data centre development in Northern Ireland, as it would increase electricity demand, place additional pressure on infrastructure and be used to justify further industrial-scale renewable developments.

It is unacceptable to continue expanding generation capacity and encouraging energy-intensive industries and without addressing the environmental, technical and economic problems within the existing system. The priority must be to fix the problems with renewable electricity infrastructure and how it is planned and managed, rather than introduce further damaging developments that place additional burdens on rural communities, protected landscapes, water and electricity consumers.

2. The 14 October 2026 Notice of Intention and premature investment commitments.

We are particularly concerned by the Department for the Economy's REPG Notice of Intention, dated 14 October 2026 and listed as published on its website on 15th October. The notice identifies onshore wind, solar photovoltaic generation and specified hybrid projects as intended technologies for the first auction. It sets out a mechanism under paragraph 31(b) of the European Commission's 2022 State aid guidelines by which developers who notify the Department before the "start of works" may make irreversible investment commitments without automatically losing potential eligibility for a future support award. The notice itself explains that the start of works can include ordering equipment, not only physical construction.

We recognise that the notice does not confer planning permission, award State aid, guarantee any contract or remove the commercial risk borne by developers. Nevertheless, we object to an administrative step expressly designed to preserve access to potential public financial support while the enabling Bill was still under Assembly scrutiny, the call for public evidence remained open, the scheme regulations were not finalised and the supporting assessments were not fully available to communities. The Department expressly refers to investor confidence and maximising participation from the existing project pipeline; the Committee should ask what comparable weight has been given to public confidence, environmental protection and rural community concerns.

We ask the Committee to call on the Department to withdraw, or at minimum suspend insofar as it concerns new onshore wind projects, the early-eligibility arrangements established by this notice, pending full legislative scrutiny,

disclosure of impact assessments and public consultation on the detailed eligibility rules.
The Committee should seek the Department's recorded decision and legal and State aid advice to the extent disclosable, the supporting rural, equality and environmental considerations, and an explanation of how prior investment commitments will not prejudice subsequent decisions or create pressure to weaken safeguards.

The Department should also clarify the notice's actual first date and time of public availability. Its text identifies 14th October as the date of publication, whereas the departmental webpage says 15th October. Because the State aid guidance refers to the notice being public before the start of works, this must be checked. We make no allegation that the notice is unlawful; we ask for evidence of the chronology and compliance relied upon.

3. Eligibility, climate claims and peatland protection – clauses 1, 3, 5 and 6.
Clause 1 relies on electricity generation that, in the Department's opinion, will contribute to lower greenhouse gas emissions. That opinion must have an evidence base, and assessments must include whole-life impacts rather than only electricity produced during operation. Peat excavation or drainage, turbine foundations, access roads, imported materials, mining for materials, associated grid works, habitat fragmentation and decommissioning can all have material environmental and carbon consequences. Connected infrastructure and cumulative impacts should not be divided into artificially narrow project assessments.

We ask for clause 3 to expressly exclude new onshore wind generating stations from eligibility for Contracts for Difference (CfDs), with clause 6 preventing allocation schemes from providing support to such developments. For any other technology that the Assembly chooses to make eligible, the legislation should require binding environmental exclusions for peatland excavation, drainage or degradation and unacceptable harm to protected landscapes such as AONBs, SCAs, designated sites, priority habitats or protected species, together with independently verifiable lifecycle carbon assessment and adherence to applicable planning, EIA, habitats and wildlife obligations.

An award of financial support must not be confused with planning consent or environmental authorisation. Equally, compliance with minimum planning law should not automatically create an entitlement to public financial support. Restoration promises, offsetting or community payments cannot be assumed to replace established peat carbon stores or repair irreversible landscape and habitat loss.

Environmental eligibility assessments should expressly address landscape and visual impacts, biodiversity loss and potential impacts on priority species,

habitats and watercourses. Specific peatland assessments should be required for all eligible renewable technologies, including solar, biomass and associated infrastructure, to establish whether projects would result in peat excavation, drainage, degradation or carbon loss.

These environmental safeguards must be legally enforceable and should operate as mandatory conditions of eligibility for financial support, rather than discretionary considerations. The legislation should require independent verification of environmental assessments before financial support is awarded, ongoing monitoring throughout the lifetime of a project, and transparent public reporting of compliance.
Where developers breach environmental conditions, fail to disclose relevant impacts or provide inaccurate or misleading information, there must be clear powers to suspend payments, recover financial support already provided, exclude projects from future allocation rounds and terminate contracts where serious breaches occur.

There should also be appropriate enforcement mechanisms to ensure that environmental damage is addressed, without allowing restoration or compensation measures to become a justification for destroying peatlands, priority habitats or protected landscapes in the first place.

The Bill should prevent subsequent modifications to projects or Contracts for Difference (CfD) terms from weakening environmental protections or circumventing the original eligibility requirements. Any material changes affecting peatlands, biodiversity, landscapes, watercourses or associated infrastructure should trigger appropriate reassessment before continued financial support is permitted. Enforcement must be independent, properly resourced and subject to public scrutiny, with clear responsibilities for investigating breaches and taking corrective action.

Environmental safeguards without effective monitoring, meaningful sanctions and the ability to withdraw and recover financial support cannot be regarded as adequate protection.

4. Public participation and delegated powers – clauses 3, 5, 6 and 18.

The Bill is an enabling framework that defers important choices about eligible technologies, qualifying conditions, allocation procedures, contract terms and community payments to later stages. The Explanatory and Financial Memorandum is helpful but is no substitute for an accessible account of costs and consequences, together with draft regulations and supporting assessments available for scrutiny before decisions are taken.

Clause 18 requires consultation with specified industry and regulatory participants and such other affected persons as the Department considers

appropriate. That discretion does not guarantee a direct voice to the communities like ours that are most exposed to these developments.

We ask that primary legislation require an open, accessible public consultation on the substantive eligibility, allocation and payment regulations, expressly including rural residents and independent environmental organisations. Draft rules, environmental screening, financial modelling and alternative options should be published sufficiently early to influence outcomes. Community consultation should not be reduced to notifying residents once the basic scheme has already been designed.

5. Financial incentives can divide communities – clause 13.

We strongly object to the assumption that payments to nearby households or grants to community organisations are inherently positive. Our experience of developer-funded grant schemes raises serious concerns about the social consequences when clubs, local groups or individuals receive, hope to receive or are encouraged to seek money connected with controversial wind factory developments. Such arrangements can place neighbours on opposite sides of a dispute, damage trust, create perceived conflicts of interest and leave some people feeling unable to voice their concerns freely. The divisions may outlast both the planning process and the developer's involvement. You only have to speak with people in the Sperrins, around Benbradagh or Drumquin to get first hand accounts of this.

Clause 13 would create powers to require payments to those living near supported generating stations, potentially making financial incentives a routine feature of development. These statutory arrangements are not legally the same as voluntary grants offered by developers during planning. Both, however, warrant scrutiny for their effects on community cohesion. Money is not a substitute for consent, it cannot make otherwise unacceptable environmental damage acceptable/loss of heritage etc and receipt of a payment must not be portrayed as endorsement of a scheme.

The industry-facing analysis published by Tughans on 2nd July 2026 discusses limiting developer's administrative and legal exposure in identifying and paying eligible residents. Those are practical matters, but they are not the whole picture. The Committee should place at least equal weight on the lived effects of financial inducements on trust, local decision-making and freedom to disagree. We ask the Committee to reconsider the policy of direct neighbour payments under clause 13, seek independent research into community-cohesion impacts, and require full transparency around developer-associated grants, sponsorship and payment arrangements. No such financial offer should be used as evidence of public consent or to inhibit objection or legal challenge.

6. Consumer costs, lessons from RHI and independent oversight – clauses 2, 10–12, 14 and 16.

CfDs involve payments to generators when the market reference price is below the strike price, and repayments by generators when it is above. The supplier levy funds the counterparty's obligations and administration. The costs may ultimately affect electricity bills; the Committee should require published modelling of likely costs, who pays, the effect of exemptions, how any repayments are passed through, and whether consumers are protected during grid constraints, curtailed generation and very low or negative electricity prices. The Renewable Heat Incentive scheme was a different intervention, but its history demonstrates why financial incentives must be tested for unintended outcomes, long-term liabilities and weaknesses in accountability before commitments are made. We ask for transparent strike-price assumptions, independently scrutinised value-for-money and affordability modelling, enforceable risk controls and public reporting of scheme allocations, payments, repayments, administration and consumer outcomes.

Under clause 16 the Department may perform monitoring and review functions itself. Genuine independence and publication of material review findings should be required, together with a clear route for corrective action.

7. Rural needs, equality, human rights and environmental assessment.

Paragraph 23 of the Explanatory and Financial Memorandum records that a Rural Needs Impact Assessment (RNIA) was undertaken and concludes that no differential rural and urban impacts were identified at this stage. We question how that conclusion was reached given the concentration of generation and associated infrastructure in our rural landscapes and given the strong opposition to onshore wind developments. The Rural Needs Act (Northern Ireland) 2016 requires relevant public authorities to give due regard to rural social and economic needs when developing or implementing policies, strategies and plans. Completing an RNIA does not, of itself, demonstrate that this statutory duty has been met. The assessment and its evidence must be disclosed and tested.

Paragraph 20 states that equality screening found no adverse section 75 impacts, paragraph 21 refers to a Regulatory Impact Assessment, and paragraph 19 asserts compatibility with the European Convention on Human Rights. We ask the Committee to obtain and publish the complete RNIA, equality screening, Regulatory Impact Assessment, Convention Rights Memorandum and Delegated Powers Memorandum, together with the reasoning behind their conclusions. We would have liked to have seen those before responding to this and feel we can't make a full representation without being able to read and analyse these important documents.

The Department should also identify any environmental or strategic assessment undertaken for the proposed scheme, or its recorded screening reasons for considering a particular assessment unnecessary.
Whether a formal SEA or habitats assessment is legally required depends on the character and effects of the measure; that question should be addressed expressly, not assumed.

We also ask the Committee to examine whether the Bill and its consequential amendments under Schedule 2 are fully consistent with Northern Ireland's existing environmental legislation and policy commitments, including the Wildlife (Northern Ireland) Order 1985, the Environment (Northern Ireland) Order 2002, the Northern Ireland Biodiversity Strategy and the Northern Ireland Peatland Strategy to 2040. The Department should explain how these environmental commitments will be reflected in binding eligibility conditions rather than treated simply as wider policy aspirations. In particular, publicly supported renewable electricity generation must not undermine efforts to protect and restore peatlands, biodiversity and priority habitats.
It is not enough to defer all such scrutiny until regulations are ready. The Bill will confer extensive powers and the Department has already taken preparatory steps under its Notice of Intention. The Committee should require scrutiny at both stages, disclosure of relevant evidence now and updated assessments when rules and allocation rounds are developed. The rights and needs of rural residents must be considered alongside the financial interests of developers.

Conclusion and request to the Committee
We ask the Committee to recommend amendments excluding new onshore wind projects from CfD support, to require binding peatland and wider environmental safeguards for any other supported generation, and to scrutinise the absence of a Northern Ireland-wide spatial strategy, live mapping and the heavy concentration of existing renewable generation in onshore wind. We also ask it to press for the withdrawal or suspension of the 14th October early-eligibility notice in relation to new onshore wind; to challenge the assumption that financial incentives benefit communities; and to secure meaningful public consultation, protection for electricity consumers and genuinely independent oversight.

We further ask that environmental eligibility conditions are subject to independent monitoring and enforceable sanctions, including suspension, recovery and termination of financial support where serious breaches occur, and that a comprehensive, publicly accessible live mapping system is established to provide transparency about the cumulative impacts of existing, approved and proposed renewable energy infrastructure.

Before concluding scrutiny, the Committee should obtain and publish the assessments and decision records described above, question the Department on

the Notice of Intention and its publication chronology, and allow supplementary community evidence once the relevant information is disclosed.

Our group is seeking supporting documentation separately through an EIR/FOI request. We should not have to do this as they should be made publicly available.

We ask that communities bearing the consequences of proposed infrastructure are heard as fully as those seeking financial support to develop it.

Kind regards

[redacted]

On behalf of Save The Moat – Save The Sperrins

Sources referred to

1. Northern Ireland Assembly, Renewable Electricity Generation Bill (42/22–27) and Explanatory and Financial Memorandum, 30 June 2026. https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/economy/legislation/bills-primary-legislation/renewable-electricity-generation-bill/
2. Department for the Economy, REPG Notice of Intention, PDF dated 14 October 2026; publication page dated 15 October 2026. https://www.economy-ni.gov.uk/publications/renewable-electricity-price-guarantee-scheme-notice-intention
3. European Commission, Guidelines on State aid for climate, environmental protection and energy 2022, paragraph 31(b). https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022XC0218(03)
4. Department for Infrastructure, SEA Environmental Report and SEA Statement accompanying the SPPS, Edition 2 (December 2025), on removal of the proposed new spatial approach. https://www.infrastructure-ni.gov.uk/publications/strategic-planning-policy-statement-edition-2
5. Department for the Economy, Electricity Consumption and Renewable Generation in Northern Ireland: Year Ending June 2026, published 3 September 2026. https://www.economy-ni.gov.uk/news/electricity-consumption-and-renewable-generation-northern-ireland-year-ending-june-2026
6. Tughans, Andrew Kirke and Charlotte Gourley, “Introduction of the Renewable Electricity Generation Bill in Northern Ireland”, 2 July 2026. https://www.tughans.com/news-insights/introduction-of-the-renewable-electricity-generation-bill-in-northern-ireland/
7. Rural Needs Act (Northern Ireland) 2016, section 1; DAERA guidance on the due-regard duty. https://www.legislation.gov.uk/nia/2016/19/body
8. See the campaign pages of Save The Moat, Save Benbradagh and No More Wind Farms Drumquin

Response ID ANON-9D6A-2B8P-G

Submitted to Renewable Electricity Generation Bill
Submitted on 2026-10-21 14:40:12

Introduction

1 What is your name?

name:
[redacted]

2 What is your email address?

email address:
[redacted]

3 Are you providing a submission on behalf of an organisation or business?

Yes

If yes, please provide the name of the organisation or business below:

Save The Moat - Save The Sperrins

Consent

4 Please confirm that you have read the Northern Ireland Assembly Committee's Privacy Notice by clicking the button below.

yes:
Yes

5 How would you like your submission to be published?

Yes. Publish in full.

Clause 1 - Overview of this Act

6 Do you agree that Contracts for Difference should be the basis for encouraging renewable electricity generation?

No

If no, how should this clause be amended?:

7 Do you agree that the generating contracts should be managed using a counterparty?

No

If yes, who should the counterparty be?:

If no, how should this clause be amended?:

8 Do you agree that the costs of the counterparty should be met by a supplier levy?

No

If no, how should this clause be amended?:

9 Do you have any further amendments that you would like to propose to this clause?

clause 1:

Yes see final comments

Clause 2 - Contracts for Difference

10 Do you agree that the Department should be able to make regulations in respect of the key terms and payments of the Contracts for Difference?

No

If no, how should this clause be amended?:

11 Do you have any further amendments that you would like to propose to this clause?

clause 2 :

Yes see final comment.

Clause 3 - Eligible generators and eligible generating stations

12 Do you agree that the Department should be able to make regulations in respect of the definition of eligible electricity generating activities?

No

If no, how should this clause be amended?:

13 Do you have any further amendments that you would like to propose to this clause?

clause 3:

See final comments

Clause 4 - Counterparty

14 Do you agree that the Department should be able to make regulations in respect of the designation of a counterparty?

No

If no, how should this clause be amended?:

15 Do you have any further amendments that you would like to propose to this clause?

clause 4:

Clause 5 - Allocation rounds

16 Do you agree that the Department should be able to make an allocation round for Contracts for Difference from time to time and at its discretion?

No

If no, how should this clause be amended?:

17 Do you agree that the Department should be obliged to publish related notices, issue terms and publish rules and thus make an allocation scheme, at its discretion?

Not Answered

If no, how should this clause be amended?:

18 Do you agree that the Department should make regulations in respect of how generators are to apply and how applications are to be adjudged as successful?

Not Answered

If no, how should this clause be amended?:

19 Do you have any further amendments that you would like to propose to this clause?

clause 5:

Additional Comments

48 Please provide any additional comments on the Bill you feel should be considered.

additional comments:

Save The Moat – Save The Sperrins is a grassroots group of residents from the Sperrins AONB and wider North West.

We oppose further onshore wind development in Northern Ireland as currently pursued and oppose new onshore wind projects receiving financial support under the Renewable Electricity Price Guarantee (REPG). We also oppose further development within AONBs and the Fermanagh and Omagh, Causeway Coast and Glens, and Derry City and Strabane council areas.

Northern Ireland lacks an adopted regional spatial strategy for onshore wind and a comprehensive live map of operational, approved and proposed projects, including grid and battery infrastructure. Communities need this information to assess cumulative impacts.

We object to the Department for the Economy's Notice of Intention dated 14 October 2026, which allows qualifying developers to begin works without automatically losing potential eligibility for future support, even though legislative scrutiny and consultation were still ongoing. We ask for its withdrawal or suspension for new onshore wind.

The Bill needs binding environmental exclusions protecting peatlands, biodiversity, watercourses, habitats and protected landscapes; whole-life carbon and environmental assessments; independent monitoring; and enforceable powers to suspend, recover or terminate financial support for serious breaches.

Developer grants and neighbour payments can divide communities, damage trust and create conflicts of interest. Financial incentives are not community consent and cannot justify irreversible environmental harm. Clause 13 requires fundamental reconsideration.

The Committee should examine consumer costs, supplier levies, lessons from RHI and independent oversight. Priority should be given to grid upgrades, reducing curtailment, energy efficiency and demand reduction rather than subsidising further onshore wind. We also oppose further AI data centres and the energy and infrastructure pressures they could create.

Full rural needs, equality, financial, human rights and environmental assessments should be published for public scrutiny. We ask for meaningful consultation, proper scrutiny of delegated powers and the opportunity to provide supplementary evidence once the documents are available.

This online response is condensed because of the 3,500-character limit. Our full written evidence, dated 21 October 2026, was emailed to Committee.Economy@niassembly.gov.uk. Please accept and consider that document alongside this response.

Save The Moat – Save The Sperrins