Subject: CAM Formal Submission — NIA Bill 42/22–27 — Opposition to Renewable Electricity Generation Bill and Further Onshore Wind Farm Development

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23 October 2026

For the attention of:

Mr Phillip Brett MLA, Chairperson
Mr Peter McCallion, Committee Clerk
Members of the Committee for the Economy
Northern Ireland Assembly
Room 349, Parliament Buildings
Ballymiscaw, Stormont
Belfast BT4 3XX

Dear Chairperson and Committee Members,

RE: RENEWABLE ELECTRICITY GENERATION BILL (NIA BILL 42/22–27) — FORMALLY AUTHORISED SUBMISSION ON BEHALF OF COMMUNITIES AGAINST MINING (CAM) — OPPOSITION TO THE BILL AND FURTHER ONSHORE WIND FARM DEVELOPMENT — STRATEGIC PLANNING, ELECTRICITY SYSTEM CONSTRAINTS, ENVIRONMENTAL PROTECTION, CONSUMER FINANCIAL EXPOSURE, RURAL COMMUNITY RIGHTS AND STATUTORY ACCOUNTABILITY

I write in my capacity as **spokesperson for Communities Against Mining (CAM)**, and with the organisation's authority, to submit our formal opposition to the Renewable Electricity Generation Bill (NIA Bill 42/22–27).

CAM respectfully requests that the Committee for the Economy recommend that the Assembly does not enact the legislation as presently proposed.

We recognise that the Committee's published call for evidence closed at noon on 21 October 2026. However, as the Assembly agreed on 22 September 2026 to extend Committee Stage until 29 January 2027, we request that this correspondence be accepted as late supplementary written evidence and circulated to Committee members before their final deliberations.

CAM's experience and basis for representation

Communities Against Mining is a community-based organisation engaged in environmental protection, public participation and scrutiny of major infrastructure proposals affecting Greencastle and the wider Sperrins.

Our involvement in the Curraghinalt planning inquiries and related environmental matters has provided substantial practical experience of the interaction between environmental assessment, protected habitats, water resources, major infrastructure, statutory consultation and public accountability.

Through these processes, CAM has examined issues involving Environmental Impact Assessment, Habitats Regulations Assessment, cumulative environmental effects, electricity infrastructure, the adequacy of information presented to decision-makers and the practical ability of communities to participate meaningfully in statutory proceedings.

Although CAM's established work has principally concerned mineral development, the underlying issues of environmental protection, regulatory independence, cumulative assessment and public participation are equally relevant to other major infrastructure proposals.

Our objection to the present Bill arises from these wider public-interest concerns.

We recognise the importance of responding to climate change, reducing greenhouse-gas emissions and maintaining a secure and affordable electricity supply.

However, we do not accept that climate obligations justify legislation which may encourage further environmentally intrusive development without sufficiently established safeguards, independent scrutiny and evidence of overall public benefit.

CAM's central objection is that the Bill proposes to establish long-term financial assistance for electricity generators while leaving essential protections for consumers, affected communities and the natural environment substantially dependent upon future regulations and departmental discretion.

Summary of CAM's position

For the avoidance of doubt, CAM's authorised position is as follows.

First, we oppose the Renewable Electricity Generation Bill in its entirety as presently proposed and request that it should not be enacted.

Second, we oppose all further onshore wind farm development throughout Northern Ireland, including new commercial wind farms, extensions to existing developments and repowering proposals involving new or replacement large-scale turbine infrastructure.

Third, our opposition extends to standalone commercial or industrial-scale turbines where their height, location or cumulative effects would result in unacceptable environmental, landscape, ecological or residential-amenity impacts.

We recognise that a small standalone turbine may present materially different circumstances from a commercial wind farm. CAM does not contend that every such installation necessarily causes unacceptable harm. Those proposals must be assessed against the applicable planning and environmental requirements.

Fourth, we oppose new commercial onshore wind developments receiving financial assistance under the proposed Renewable Electricity Price Guarantee (REPG) scheme.

Fifth, we consider that the Department for the Economy has not sufficiently demonstrated why additional financial incentives for generating capacity should take precedence over addressing existing electricity-system constraints, network deficiencies, environmental protection and consumer affordability.

Finally, our opposition is not conditional upon additional developer assurances, community payments or improved mitigation measures.

These positions should be understood as substantive objections to the proposed policy, rather than requests to secure CAM's support through amendments.

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1. Climate Change Act obligations do not establish the necessity of the proposed Bill

Section 15 of the Climate Change Act (Northern Ireland) 2022 establishes the statutory target of ensuring that at least 80% of electricity consumption comes from renewable sources by 2030.

CAM recognises that obligation.

However, the legislation does not prescribe this particular contract-for-difference mechanism, require unrestricted financial assistance for additional onshore wind development or displace existing environmental and planning obligations.

The Assembly must distinguish between the statutory objective of increasing renewable electricity consumption and the separate question of the most appropriate means of achieving that objective.

Section 1 of the proposed Bill provides for financial assistance intended to encourage generation which, in the Department's opinion, will contribute to reducing greenhouse-gas emissions.

We question whether that formulation establishes a sufficiently objective basis for determining eligibility for substantial, potentially long-term financial assistance.

The environmental and climate performance of renewable electricity infrastructure should not be assessed exclusively by reference to electricity generated during operation.

Where material, proper consideration should be given to construction emissions, manufacturing, peat excavation, drainage, land-use change, associated grid infrastructure, access roads, habitat disturbance and decommissioning.

In particular, established peatlands can perform important carbon-storage and ecological functions which may be seriously affected by large infrastructure development.

We therefore request that the Committee examine why the Bill does not expressly establish independently verifiable, proportionate lifecycle-carbon assessment and environmental eligibility requirements.

A statutory renewable-electricity target does not establish that every additional wind farm constitutes sustainable development or warrants further public financial support.

2. Existing renewable generation is being constrained — further incentives require independent justification

The Department for the Economy's statistics published on 3 September 2026 provide important evidence.

For the 12 months ending June 2026:

- Renewable electricity generation amounted to **4,431 GWh**, equivalent to approximately **50% of gross final electricity consumption**.
- Total gross final electricity consumption was **8,865 GWh**.
- Wind accounted for approximately **74% of renewable electricity generation**.

These figures demonstrate that wind already provides the substantial majority of Northern Ireland's renewable electricity generation.

They also demonstrate that Northern Ireland remains below the statutory 2030 target.

However, neither fact establishes that further onshore wind farms necessarily represent the most environmentally responsible or economically efficient response.

The existing system is already experiencing significant operational constraints.

The EirGrid and SONI *Annual Renewable Energy Constraint and Curtailment Report 2024*, published in April 2025, records that:

915 GWh of available wind energy in Northern Ireland was dispatched down during 2024, equivalent to 29.6% of total available wind energy.

The report identifies factors including transmission outages, security-of-supply requirements and increased interconnector imports.

CAM recognises that the figures concern 2024 and that dispatch-down levels can vary between years.

We do not suggest that all constrained generation could necessarily have been accommodated without compromising electricity-system security.

Nevertheless, the scale of the recorded problem raises fundamental questions about the proposed financial incentives.

Before authorising additional long-term support, the Committee should require independent evidence addressing:

1. The most recent verified levels of wind-generation constraints and curtailment.
2. Their causes and the remedial measures planned by SONI, NIE Networks and relevant authorities.
3. The projected effects of additional generating capacity upon existing system constraints.
4. The interaction between CfD commitments, network reinforcement and electricity storage.
5. The financial treatment of constrained generation and its implications for consumers.
6. Whether alternative investment could deliver greater environmental and economic benefits.

We recognise that additional generation and network improvements may sometimes need to proceed together.

However, the Department should demonstrate that the sequencing and cost of those investments are appropriate.

CAM considers it unacceptable to presume that further subsidies for commercial onshore wind development are justified while substantial quantities of already available renewable electricity have been unable to reach consumers.

Improving the effectiveness of the existing electricity system should be a central priority before further onshore wind farm expansion is financially encouraged.

3. The absence of a comprehensive regional spatial strategy

CAM considers the lack of a comprehensive, adopted Northern Ireland-wide spatial framework for renewable infrastructure to be a significant weakness in the current policy approach.

Northern Ireland has regional planning policy, Local Development Plans and statutory environmental-assessment requirements.

However, these arrangements are not equivalent to an integrated regional assessment identifying appropriate and inappropriate locations for further major renewable infrastructure, having regard to existing development, regional concentration and cumulative impacts.

This issue is especially important following publication of the Strategic Planning Policy Statement, Edition 2, on 11 December 2025.

The Department for Infrastructure's accompanying Strategic Environmental Assessment Statement confirms that a proposed spatial approach was considered during the policy-review process but was not carried forward into the final policy.

That decision requires explanation.

SPPS Edition 2 continues to address renewable energy, landscape protection and cumulative effects.

However, paragraph 6.230 also provides for significant weight to be given to the benefits of proposals to repower, expand and extend wind and solar farms unless their impacts are unacceptable.

CAM questions whether the current framework provides adequate strategic protection against the continued concentration of wind-energy infrastructure in particular rural regions.

The Sperrins demonstrate the importance of this issue.

Successive developments can create cumulative effects involving landscape transformation, peatland disturbance, habitat fragmentation, road construction, substations, electricity connections and impacts upon connected river catchments.

These effects may extend beyond individual planning boundaries and across district-council areas.

Our experience of major infrastructure assessment demonstrates the importance of examining the combined consequences of related development rather than relying upon disconnected consideration of individual projects.

We therefore request that the Committee:

- Obtain a reasoned explanation from the Department for Infrastructure concerning the removal of the proposed spatial approach.
- Examine whether the cumulative effects of existing, approved and proposed renewable infrastructure have been sufficiently assessed.

- Require consideration of regional concentrations of development and associated grid infrastructure.
- Recommend a comprehensive, publicly accessible and regularly updated mapping system identifying generating infrastructure, proposed developments and relevant environmental constraints.

Such a mapping system should include wind farm boundaries, turbine locations and heights, associated electricity connections, substations, access infrastructure, storage installations, designated landscapes, peatlands and priority habitats.

It should permit meaningful assessment of development across council boundaries.

These measures are necessary for transparency and sound environmental governance. They should not, however, be interpreted as grounds upon which CAM would support further onshore wind farm development.

Our opposition to additional commercial wind farms remains.

4. The Department's Notice of Intention — 14 October 2026

CAM is particularly concerned by the Department for the Economy's REPG Notice of Intention.

The document itself identifies 14 October 2026 as its publication date, while the departmental publication webpage is dated 15 October 2026.

The Notice identifies onshore wind, solar photovoltaic generation and specified hybrid projects as intended eligible technologies for the first allocation round.

It refers to paragraph 31(b) of the European Commission's 2022 Guidelines on State aid for climate, environmental protection and energy.

The Notice is intended to allow qualifying developers to progress projects while preserving potential eligibility for future financial assistance, subject to the applicable requirements.

The relevant concept of commencement of works may include irreversible investment commitments, including firm commitments to order equipment.

CAM acknowledges that the Notice does not grant planning permission, award financial assistance, guarantee a CfD or remove the commercial risks borne by developers.

Nevertheless, its timing raises substantial questions about legislative scrutiny and public administration.

The Department has taken an administrative step designed to facilitate potential investment commitments while the Assembly has not completed scrutiny of the legislation or finally determined the applicable financial eligibility arrangements.

The Notice refers expressly to investor confidence and facilitating participation from the existing pipeline of potential developments.

CAM asks what equivalent consideration has been demonstrated for public confidence, environmental protection and the interests of rural communities likely to be affected.

We request that the Committee obtain:

1. The Department's recorded policy decision authorising publication of the Notice.
2. Confirmation of the precise date and time it first became publicly accessible.
3. The legal and State aid basis relied upon, together with any disclosable supporting analysis.
4. The relevant environmental, equality, rural-needs and public-participation considerations.
5. An explanation of how early commercial investment will not prejudice later legislative or environmental decisions.
6. Clarification of whether the Notice creates any practical pressure against subsequent restrictions on financial eligibility.

We further request that the Committee recommend withdrawal or suspension of the early-eligibility arrangements relating to new commercial onshore wind development, subject to the Department's assessment of the lawful means of doing so, pending completion of legislative scrutiny.

CAM does not allege that the Notice is inherently unlawful.

Our objection is that its purpose and timing require careful examination before additional financial-support powers are authorised.

Commercial investment expectations should not be permitted to predetermine the outcome of legislative scrutiny or influence the lawful determination of environmental and planning matters.

5. Clauses 3, 5 and 6 — eligibility and the distinction between financial support and planning permission

Clauses 3, 5 and 6 establish significant elements of the proposed eligibility and allocation framework.

Clause 3 provides for regulations defining eligible generating activities and generating stations.

Clause 6 permits allocation schemes to address matters including technology, generating capacity, geographical location and financial limits.

The Bill therefore leaves substantial decisions concerning eligibility to future regulations and allocation arrangements.

CAM considers the absence of express environmental exclusions in primary legislation a significant weakness.

There is an important distinction between whether a development can lawfully obtain planning permission and whether it should qualify for financial support.

Planning permission does not create an automatic entitlement to public financial assistance.

Similarly, a CfD award should not be treated as granting planning permission or demonstrating environmental acceptability.

CAM opposes further commercial onshore wind farm development and does not support the allocation of REPG financial assistance to new wind farms, extensions or large-scale repowering schemes.

We therefore request an express exclusion of new commercial onshore wind generation from the proposed financial-support arrangements.

If the Assembly rejects our primary request for the Bill not to proceed, such an exclusion should be secured through the statutory eligibility framework and associated allocation arrangements.

Standalone industrial-scale turbines should also receive appropriate scrutiny. They should not escape relevant environmental restrictions merely because they are not part of a multi-turbine wind farm.

For other technologies, CAM requests binding eligibility standards addressing environmental compliance, lifecycle carbon performance, sensitive habitats, cumulative effects and associated infrastructure.

6. Environmental assessment, peatlands, water protection and enforceable safeguards

CAM's experience in planning and environmental proceedings demonstrates the importance of effective assessment before decisions are made which may have long-lasting consequences.

Peatlands, protected habitats, river catchments and upland landscapes provide important environmental functions.

Major development may affect those functions through excavation, drainage, construction, access infrastructure and changes to the water environment.

Established peat carbon stores and ecological systems cannot automatically be reproduced through reinstatement or compensation proposals.

CAM therefore asks the Committee to examine the interaction between the proposed financial-support framework and existing legislation, including:

- The Planning Act (Northern Ireland) 2011.
- The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017.
- The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995, as amended.
- The Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017.
- The Wildlife (Northern Ireland) Order 1985.
- The Strategic Planning Policy Statement, Edition 2.
- Relevant biodiversity and peatland-policy commitments.

The Bill does not itself repeal these statutory protections.

However, compliance with separate planning and environmental regimes does not automatically establish that a project should receive financial assistance.

We request that financial eligibility, where any scheme is established, be subject to objectively defined environmental standards.

Those standards should address appropriate lifecycle-carbon assessment, cumulative impacts, associated grid infrastructure and material changes to projects.

There should be independent verification and effective monitoring.

Serious and established breaches of applicable financial eligibility conditions should be capable of attracting proportionate sanctions, including suspension of payments, recovery of assistance or contractual termination where justified.

Environmental safeguards without effective enforcement and public accountability cannot provide adequate protection.

These requests are made as fallback protections only and do not constitute CAM's support for further onshore wind farms.

7. Clauses 10–12 and 14 — financial exposure and consumer protection

The proposed CfD arrangements are intended to provide financial certainty by reference to agreed strike prices and electricity market reference prices.

CAM recognises that CfDs involve payments in both directions.

Generators may receive payments when reference prices fall below agreed strike prices and make payments when reference prices exceed them.

However, the consequences for consumers depend upon the detailed financial arrangements, market conditions, contract duration and treatment of funds received by the counterparty.

Clause 10 establishes the basis for a supplier levy.

Clause 12 permits arrangements for payments to suppliers and the transfer of specified benefits to consumers.

Clause 14 addresses sums held by the counterparty and the arrangements for meeting its liabilities.

We are concerned that the Bill does not establish sufficiently clear primary-legislation guarantees concerning affordability and the allocation of financial risk.

CAM requests independent examination of:

1. Projected supplier-levy costs under differing wholesale electricity price scenarios.
2. Strike-price assumptions, contract duration and indexation.
3. The distribution of costs between households, small businesses and larger industrial consumers.
4. Any proposed exemptions and their consequences for other electricity customers.
5. The treatment of negative electricity prices and constrained generation.
6. How payments returned by generators will benefit consumers.
7. The interaction between support costs and electricity-network investment.
8. The adequacy of counterparty reserves, default arrangements and financial oversight.

The Committee should also consider lessons arising from the Renewable Heat Incentive scheme.

Although RHI involved a different technology and financial mechanism, its history demonstrates the importance of scrutinising long-term financial commitments and potential unintended consequences.

We are additionally concerned that increased electricity demand associated with large data centres or other energy-intensive developments may be used to justify additional generating infrastructure.

Demand projections should be transparent, independently assessed and accompanied by consideration of environmental, network and consumer-cost implications.

Financial certainty for commercial generators should not be prioritised over the long-term financial interests of electricity consumers.

8. Clause 13 — financial benefits cannot substitute for community consent

Clause 13 permits regulations requiring participating generators to make payments to specified persons.

CAM questions the assumption that such payments necessarily strengthen communities.

Experience of controversial infrastructure proposals demonstrates that financial arrangements associated with developers may generate divisions, perceived conflicts of interest and concerns about the independence of local organisations.

We recognise the legal distinction between statutory community-benefit arrangements and voluntary developer-funded grants.

Nevertheless, both warrant appropriate scrutiny where their effects upon community cohesion may be material.

The Committee should therefore seek independent evidence examining the consequences of such arrangements.

We request that any future regulations protect the rights of residents and community organisations to decline payments, express opposition, participate in inquiries and pursue available legal remedies.

Receipt of a payment must not be represented as agreement to a development.

Nor can a financial benefit establish compliance with environmental legislation or make otherwise unacceptable development acceptable.

Community benefit must not be confused with community consent.

Additional payments would not alter CAM's opposition to further commercial onshore wind farm development.

9. Clauses 15–19 — delegated powers, independent oversight and public participation

The Bill confers substantial regulatory and administrative powers upon the Department.

Although significant regulations require affirmative Assembly approval, essential public-interest safeguards should not be left predominantly to future departmental discretion.

Clause 16(6) permits the Department to arrange for monitoring and review functions to be performed by others or to exercise those functions itself.

CAM considers that provision a substantial governance concern.

A Department responsible for scheme design and implementation should not be permitted to rely solely upon its own oversight when assessing the proper exercise of allocation functions.

We request a statutory requirement for independent monitoring, transparent appointment procedures, conflict-of-interest safeguards and publication of substantive findings.

Clause 18 also warrants scrutiny.

It requires consultation with specified electricity-sector participants and other persons or representatives whom the Department considers appropriate.

However, it does not expressly guarantee direct and comprehensive consultation with affected rural communities or independent environmental organisations.

Clause 18(2) permits consultation undertaken before enactment to satisfy the consultation requirement.

CAM considers that provision particularly concerning where substantive regulations may not yet have been published or fully examined by affected communities.

The Committee should require meaningful consultation on material regulations before decisions are finalised.

Clause 19 also permits consequential and supplementary regulations, including provisions capable of amending statutory legislation.

The necessity, scope and scrutiny arrangements governing these powers should be carefully examined.

The importance of democratic accountability increases where legislation creates substantial financial powers whose practical consequences will be determined through later regulations.

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

The Bill's Explanatory and Financial Memorandum records that equality screening identified no adverse section 75 impacts requiring a full Equality Impact Assessment.

It also states that a Rural Needs Impact Assessment identified no differential impacts between rural and urban areas at that stage.

CAM questions whether these conclusions sufficiently reflect the geographical concentration of generating infrastructure and the potential environmental and social burdens placed upon rural communities.

The Rural Needs Act (Northern Ireland) 2016 imposes a duty upon relevant public authorities to have due regard to rural social and economic needs when exercising functions within its scope.

Completion of an assessment is not, by itself, conclusive evidence that all relevant considerations have been adequately addressed.

We request that the Committee obtain and examine the underlying Rural Needs Impact Assessment, equality screening, Regulatory Impact Assessment, Convention-rights material and Delegated Powers Memorandum.

Particular attention should be given to the distribution of infrastructure-related burdens, rural amenity, livelihoods, tourism, community wellbeing and access to meaningful participation.

The Department should also identify the environmental assessment or screening reasoning relevant to the proposed support framework.

CAM recognises that formal Strategic Environmental Assessment or Habitats Regulations Assessment is not automatically required merely because financial-support legislation is proposed.

Whether such assessments are legally necessary depends upon the particular measure and the applicable statutory requirements.

However, the Department should provide a reasoned and transparent explanation of its assessment position.

The potential environmental implications of the scheme should not be dismissed solely because individual generating projects will subsequently require separate planning or environmental consideration.

11. The need to assess alternatives and demonstrate the necessity of the proposed scheme

CAM considers that the Department has not sufficiently demonstrated why this particular support framework represents the most appropriate response to Northern Ireland's electricity requirements.

The Explanatory and Financial Memorandum identifies the principal legislative options as taking no action or proceeding with the proposed enabling framework.

We recognise that the Department has undertaken earlier policy consultation and published a Final Scheme Design.

Nevertheless, the Committee should test whether the underlying assessment of alternatives remains sufficiently comprehensive, particularly in light of electricity-system constraints, consumer costs and cumulative environmental concerns.

Relevant alternatives or complementary measures include:

- Greater investment in electricity-network efficiency and reinforcement.
- Measures reducing renewable-generation constraints and curtailment.
- Electricity storage and demand management.
- Improvements in domestic, commercial and industrial energy efficiency.
- Greater emphasis upon suitably located rooftop and previously developed-land solar generation.
- Other environmentally appropriate low-carbon technologies.
- Measures reducing avoidable electricity demand.

CAM recognises that no single alternative necessarily satisfies Northern Ireland's entire statutory target.

However, that is not a reason to assume that further commercial onshore wind development, supported by long-term CfDs, represents the preferable solution.

The Department should demonstrate the comparative costs, benefits and environmental consequences of realistic alternatives.

The burden of demonstrating that this financial-support scheme is necessary, proportionate and in the wider public interest rests with those proposing its enactment.

12. Subsidy control and the Windsor Framework

The proposed support mechanism must comply with the applicable subsidy-control framework.

The Department's October Notice expressly refers to the European Commission's 2022 Guidelines on State aid for climate, environmental protection and energy.

The Committee should therefore examine the proposed legal basis of the scheme, including the potential application of Article 10 of the Windsor Framework and relevant EU State aid rules.

Where the Subsidy Control Act 2022 governs a particular measure, compliance with the applicable domestic requirements must also be demonstrated.

CAM does not suggest that renewable electricity support is automatically incompatible with subsidy-control law.

Our concern is whether the proposed scheme has been sufficiently justified and appropriately structured, including in relation to eligibility, financial proportionality, consumer interests and any necessary approval arrangements.

The Department should explain how substantial amendments to eligibility or the removal of commercial onshore wind from the scheme would affect any required approvals.

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13. Formal requests on behalf of Communities Against Mining

In light of the matters raised, **CAM formally requests that the Committee for the Economy:**

1. Records CAM's opposition to the Renewable Electricity Generation Bill in its entirety.

2. Recommends that the Assembly does not enact the Bill as presently proposed.

3. Requires an independently evidenced reconsideration of the proposed REPG scheme, including its necessity, environmental implications, consumer costs and reasonable alternatives.

4. Recommends that new commercial onshore wind developments, including wind farms, extensions and qualifying large-scale repowering proposals, should not receive REPG financial support.

5. Obtains a full explanation of the Department's 14 October 2026 Notice of Intention, including its legal basis, precise publication chronology and implications for legislative scrutiny.

6. Requests that the Department examine the lawful withdrawal or suspension of the Notice's early-eligibility arrangements insofar as they concern new commercial onshore wind projects.

7. Requires independent examination of existing renewable-generation constraints and the consequences of financially supporting further generating capacity.

8. Obtains transparent financial modelling addressing supplier levies, consumer affordability, exemptions, counterparty liabilities and related network costs.

9. Examines the implications of the regional spatial approach not being carried forward into SPPS Edition 2.

10. Obtains and scrutinises the relevant rural-needs, equality, regulatory, environmental and human-rights assessments.

11. Examines the adequacy of delegated powers, independent monitoring, environmental eligibility, enforcement and public-participation arrangements.

12. Requests a clause-specific written departmental response to the principal matters identified in this submission.

13. Ensures that affected rural communities and organisations engaged in environmental protection are afforded meaningful opportunities to provide supplementary evidence before the Committee concludes its scrutiny.

We further request that the Department for Infrastructure, copied into this correspondence, separately examine CAM's opposition to further onshore wind farm development.

In particular, we request a fundamental review of the regional planning policies facilitating new commercial wind farms, extensions and large-scale repowering proposals.

That review should address SPPS Edition 2, cumulative environmental and landscape impacts, regional concentrations of development and the adequacy of existing strategic planning arrangements.

We request that the Department for the Economy and Utility Regulator respond, within their respective responsibilities, to the electricity-system and consumer-financing issues identified above.

If, contrary to CAM's primary objection, the Assembly proceeds with the Bill, we request enforceable environmental eligibility standards, independent oversight, effective consumer protections and meaningful public consultation.

For the avoidance of doubt, these fallback safeguards are identified solely because of their public-interest importance. They do not represent CAM's support for the Bill, further onshore wind farm development or additional financial incentives for such projects.

14. Conclusion — CAM's formal and unequivocal opposition

Northern Ireland has important responsibilities to address climate change, protect the natural environment and maintain a secure and affordable electricity supply.

These responsibilities must be fulfilled together.

However, CAM does not accept that continued expansion of commercial onshore wind farms represents the most environmentally responsible or sufficiently justified response to existing electricity-system deficiencies.

The evidence demonstrates that significant quantities of renewable electricity have already been subject to constraints and curtailment.

The cumulative consequences of further development have not been addressed through a comprehensive, adopted Northern Ireland-wide spatial siting framework.

The spatial approach considered during revision of the SPPS was not carried forward.

At the same time, the Department for the Economy has issued a Notice of Intention intended to preserve potential financial eligibility for developers making early commercial commitments while the enabling legislation remains under scrutiny.

The Bill proposes substantial powers concerning financial assistance, eligibility, supplier levies and contractual arrangements without establishing what CAM considers to be adequate safeguards in primary legislation for environmental protection, consumer affordability and independent public accountability.

These matters concern the fundamental justification for the proposed legislation.

They should not be dismissed as minor implementation issues capable of being addressed entirely through subsequent regulations.

Our experience of major infrastructure proceedings demonstrates the importance of ensuring that essential environmental and public-interest information is properly examined before decisions are made.

We do not accept that additional financial incentives, community payments or developer commitments can substitute for that scrutiny.

Nor do we accept that the environmental and social consequences of further commercial onshore wind development should be imposed upon rural communities merely because projects may contribute to statutory renewable-electricity targets.

CAM's position is therefore unequivocal.

We oppose the Renewable Electricity Generation Bill (NIA Bill 42/22–27) in its entirety.

We oppose further commercial onshore wind farm development throughout Northern Ireland, including new wind farms, extensions and large-scale repowering proposals involving new turbine infrastructure.

We oppose further REPG financial assistance for new commercial onshore wind projects.

We oppose standalone commercial or industrial-scale turbines where their scale, location or cumulative effects would result in unacceptable environmental, landscape, ecological or residential-amenity harm.

We oppose the continued reliance upon developer-led onshore wind expansion without first addressing existing electricity-system constraints, regional planning deficiencies, cumulative environmental effects and consumer financial exposure.

Our position is not conditional upon improved mitigation, additional community benefits or revised developer assurances.

We recognise that the wider question of preventing further wind farm approvals extends beyond the financial provisions of this particular Bill and requires separate consideration by the relevant planning authorities and the Department for Infrastructure.

Nevertheless, the Committee for the Economy should examine whether it is appropriate to authorise additional financial assistance for an infrastructure sector whose cumulative impacts and associated system costs remain matters of substantial concern.

The Assembly's responsibility is not simply to facilitate commercial investment or increase installed generating capacity. It is to determine whether the proposed statutory powers are necessary, proportionate, financially justified, environmentally responsible and consistent with the wider public interest.

CAM does not consider that justification to have been sufficiently established.

We therefore respectfully request that the Committee recommend that the Assembly does not enact the Renewable Electricity Generation Bill as presently proposed.

We would appreciate written confirmation that this submission has been received, whether it will be accepted as late supplementary evidence and whether it can be circulated to Committee members before the conclusion of Committee Stage.

We further request a substantive written response from the relevant authorities on the matters identified, particularly the October Notice of Intention, existing renewable-generation constraints, the absence of a comprehensive regional spatial approach and the proposed allocation of financial and regulatory powers.

Yours faithfully,

[redacted]
Authorised Spokesperson
Communities Against Mining (CAM)
Greencastle, County Tyrone

Schedule A — Principal supporting legislation, policy and evidence

A1. Renewable Electricity Generation Bill (NIA Bill 42/22–27) — introduced 30 June 2026, particularly clauses 1–3, 5–6, 10–19 and Schedule 2.

https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/economy/legislation/bills-primary-legislation/renewable-electricity-generation-bill/

A2. Explanatory and Financial Memorandum accompanying the Bill — options considered, financial implications, equality screening, Regulatory Impact Assessment and Rural Needs Impact Assessment.

Available through the Assembly Bill webpage above.

A3. Climate Change Act (Northern Ireland) 2022, particularly section 15.

https://www.legislation.gov.uk/nia/2022/31/contents

A4. 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

A5. EirGrid and SONI — Annual Renewable Energy Constraint and Curtailment Report 2024, published April 2025, particularly section 2.2 concerning Northern Ireland.

https://cms.soni.ltd.uk/sites/default/files/publications/Annual%20Renewable%20Constraint%20and%20Curtailment%20Report%202024%20V1.0.pdf

A6. Department for Infrastructure — Strategic Planning Policy Statement, Edition 2, published 11 December 2025, particularly paragraphs 6.227 and 6.230, and the accompanying Strategic Environmental Assessment Statement.

https://www.infrastructure-ni.gov.uk/publications/strategic-planning-policy-statement-edition-2

A7. Department for the Economy — REPG Notice of Intention, document dated 14 October 2026 and associated publication webpage dated 15 October 2026.

https://www.economy-ni.gov.uk/publications/renewable-electricity-price-guarantee-scheme-notice-intention

A8. Department for the Economy — Final Scheme Design for the REPG, published 19 September 2025.

https://www.economy-ni.gov.uk/publications/final-scheme-design-renewable-electricity-support-scheme-northern-ireland-renewable-electricity-price-guarantee

A9. Principal planning and environmental legislation — Planning Act (Northern Ireland) 2011; Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017; Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995, as amended; Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017; and Wildlife (Northern Ireland) Order 1985.

A10. Governance and public-participation framework — Rural Needs Act (Northern Ireland) 2016; Northern Ireland Act 1998, section 75; Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004; Environmental Information Regulations 2004, where applicable; and the Aarhus Convention.

A11. Subsidy-control framework — Subsidy Control Act 2022; Article 10 of the Windsor Framework, where applicable; and European Commission Guidelines on State aid for climate, environmental protection and energy 2022.

A12. Northern Ireland Assembly Official Report, 22 September 2026 — confirming extension of Committee Stage to 29 January 2027.

https://aims.niassembly.gov.uk/officialreport/report.aspx?docID=498922&eveDate=2026%2F09%2F22