

SPP Review - Priorities for Change

Contact Details

Name : Gareth Mills	Organisation : RWE Npower Renewables Limited
Telephone No : 0845 071 7691	Email : gareth.mills@rwe.com
Address: RWE Npower Renewables Limited, Earn House, Lamberkine Drive, Broxden Business Park, PERTH, PH1 1RA	

Policy Ideas

The review is of the SPP as a whole – please consider connections and tensions between policy subjects

Policy Subject/s: Renewable Energy

What works?

Scottish Planning Policy (SPP) reflects the need to increase the deployment of renewable energy developments with responsibly sited projects. However, SPP was published in 2009 at a time when our 2020 targets were sourcing the equivalent of 20% of all energy and 50 % electricity from Renewables. These targets have since to 30% and 100% respectively.

We would encourage the Scottish Government to continue to show their support of renewables development and reflecting these targets

The 2009 Consolidation of Scottish Planning Policy presented us with a number of concerns that the key principles of SPP 6 (Renewable Energy) could be lost. It has therefore been of great relief to find that SPP has retained these principles while making a significant contribution towards modernising the Scottish Planning System.

It is essential that the current review of Scottish Planning Policy continues to uphold these key principles and where appropriate build upon them to further improve efficiency, making it more inclusive fit for purpose and sustainable.

We have outlined some of the principles below

- Planning authorities should continue to determine those applications that are, or come, before them ahead of revised local policies being put in place.
- Planning authorities should set out in the development plan a spatial framework for onshore wind farms of over 20 megawatts generating capacity. Authorities may incorporate wind farms of less than 20 megawatts generating capacity in their spatial framework if considered appropriate.
 - Spatial policies should not be used to restrict development on sites where the technology can operate efficiently and environmental and other impacts can be addressed.
 - In all instances, development plans should provide clarity on the criteria that should be met to enable development to take place in a satisfactory manner.
 - Plans should ensure that individual proposals are assessed against clear policies so that clarity is provided on the potential for the development of renewable energy technologies throughout the area, using broad criteria
- The existence of natural heritage designations and other constraints should not be incompatible with the need to encourage smaller-scale wind developments
- Delivery of revised spatial and criteria-based policies must be part of a comprehensive and inclusive process which takes account of views of all stakeholders including community and developer interests

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- The existence of broad areas of search should not be used to rule out development elsewhere if it can be accommodated in a manner consistent with the approach set out in this SPP
- When considering cumulative impact, planning authorities should take account of existing wind farms, those which have permission and valid applications for wind farms which have not been determined. Decisions should not be unreasonably delayed because other schemes in the area are at a less advanced stage in the application process

What doesn't work?

While our renewable energy ambitions are underpinned by political support, we are concerned with the disconnect that exists between national and local policy and decision making. Updating policy presents a significant challenge for local authorities aiming to produce local development plans and supplementary planning guidance within the required timeframes. A number of local authorities have missed these deadlines, causing delay in the implementation of the policies within SPP (and previously SPP 6 for Renewable Energy), including the creation of spatial frameworks for wind farms.

Furthermore, there is growing concern that some local authorities' planning guidance has been used as a consideration in the decision making process while only in draft form. In some cases, published guidance appears to be becoming more prescriptive and does not provide proportionate guidance across a range of renewable energy technologies.

In order to ensure government priorities are delivered, we recommend that Scottish Government use the current review of Scottish Planning Policy to ensure that revised local development plans and supplementary guidance across all authorities are in line with SPP and subject to an appropriate level of consultation and policy scrutiny by Scottish Ministers to help calibrate methodology, aid a consistent approach and ultimately avoid planning by appeal.

The Scottish Parliament's Economy, Energy and Tourism Committee published its 'Report on the Achievability of the Scottish Government's Renewable Energy Targets' on Friday 23 November 2012. While this report concludes that the 100 per cent renewable electricity target for 2020 is achievable, albeit with a number of challenges, it signals that the renewable heat target of 11 per cent by 2020 will be extremely challenging, despite the interim target being exceeded.

In Scotland, approximately 50% of all energy consumption is for the purpose of heating, with the domestic sector accounting for approximately half of the total demand. In the coming years a number of incentives such as the, Renewable Heat incentive, Feed in tariff, and Renewable Energy Investment Fund (REIF) will encourage further development of heat networks and other technologies. However, while these funds support the generation of renewable energy they do not account for the cost of the network. By recognising heat networks as a 'national development' the Scottish Government will contribute to the national development objectives while further improving energy security and tackling fuel poverty by protecting consumers against the spiralling costs of fossil fuels, particularly those consumers in off gas grid areas.

It is essential that Scottish Planning Policy plays a strategic role in encouraging the development of 'heat generating technologies' and we encourage the Scottish Government to recognise the recommendations outlined by the EET committee report within the plan by:

- *Encouraging local and national government to lead the way in investing in renewable heat and district heating schemes, producing local heat maps and in creating a culture in which heat is a valued commodity and by raising awareness of RHI.*
- *Calling for more local authority heat mapping and coordination of planning decisions on new*

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industrial and domestic developments to identify synergies

Why?

One of the biggest concerns with the implementation of Scottish Planning Policy has been the disconnect that exists between local and national policy. Through our engagement with a number of Local Authorities, we are aware of the growing number of pressures experienced by both local authority planners and elected officials as we move faster and further towards realising our renewable energy ambitions.

Government incentives such as the Feed-in Tariff have undoubtedly created increasing pressure for local authority planning departments to respond to an ever-greater volume of renewable energy applications with what are already constrained budgets as communities and individuals continue to take a stake in their energy future.

We are concerned at the disproportionate approach being made by planning authorities and statutory consultees to requesting information from applicants on environmental concerns, visual impact and noise assessment. We appreciate that, where planning officers are under pressure to determine a number of relatively technical applications within the required timeframe - often in the face of a degree of local opposition - there is a temptation to simply request more detailed yet seemingly unnecessary information from the applicant, at significant additional cost. We would encourage the Scottish Government to use Scottish Planning Policy as a means of addressing this issue.

Onshore wind is one of the most mature renewable technologies deployed globally, and is likely to make up largest proportion of Scotland's renewable energy generation by 2020. The development of this technology underpins the emerging offshore wind, wave and tidal industries by providing many of the infra-structure upgrades required to ensure that these vast resources of power in some of the most remote parts of our country can be accessed by the parts of the country where demand is highest. We believe that Scottish Planning policy must play a role in articulating this relationship, both in the interests of managing public perception and maintaining investor confidence.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

- We would encourage the Scottish Government to continue to show their support of the development of renewable energy technologies by reflecting targets within Scottish Planning Policy
- It is essential that the current review of Scottish Planning Policy continues to uphold its key principles and where appropriate builds upon them to further improve its efficiency, making it more inclusive fit for purpose and sustainable.
- In order to ensure government priorities are delivered, Scottish Renewables recommend that Scottish Government use the current review of Scottish Planning Policy to ensure that revised local development plans and supplementary guidance across all authorities are in line with SPP and subject to an appropriate level of consultation and policy scrutiny by Scottish Ministers to help calibrate methodology, aid a consistent approach and ultimately avoid planning by appeal.

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