



Scottish Environment LINK  
2 Grosvenor House  
Shore Road  
Perth  
PH2 8BD

Tel 01738 630804  
Fax 01738 643290

enquiries@scotlink.org  
www.scotlink.org

Dear Ian

## **Consultation on draft Scottish Planning Policy (SPP) 6: Renewable Energy**

### **Introduction**

This response from Scottish Environment LINK addresses various issues on which a number of LINK members share views and concerns. Some of these organisations will be submitting individual responses covering other issues as well. We are grateful for the opportunity of a week's extension to the deadline for responding to the consultation.

Scottish Environment LINK members welcome draft SPP6. Through our representatives on the Environmental Advisory Forum on Renewable Energy, we have been involved in the pre-consultation discussions to develop the SPP, and we recognise the complexity of and sometimes competing demands made by the many issues which SPP6 has to address.

### **Sustainable development and support for renewable energy**

LINK members remain supportive of the renewable energy targets set by the Executive as one of the key ways of reducing our carbon emissions year on year. In this context it is important that SPP6 links explicitly to complementary strategies, policies and targets for reducing demand and enhancing energy efficiency, since the current trend of increasing demand is otherwise likely to undermine progress to be achieved by renewables.

Scottish Environment  The voice of Scotland's environment movement

Registered Office: 2 Grosvenor House, Shore Road, Perth PH2 8BD. A Scottish Charity under Scottish Charity No SC000296.  
Scottish Environment LINK is a Scottish Company Limited by guarantee and without a share capital under Company No SC250899.



We welcome the policy's recognition of the potential range of renewable technologies and support the proposal to meet the 2020 target through a mix of these technologies. We are also pleased to see the policy's recognition that renewables can provide more than just electricity, in particular its inclusion of heat at the small to medium scale.

### **Planning context – a Scottish Energy Strategy**

However, the SPP does not answer a number of major concerns relevant to the task it sets local authorities. LINK and other stakeholders have called on the Executive to set out an overall Scottish Energy Strategy for the medium to longer term. Such a strategy should, in the context of the National Planning Framework, inform and guide development of this sector and others, relevant to energy considerations. It should identify the anticipated relationship between onshore and offshore contributions in the medium to longer term. Whilst offshore projects are beyond the remit of the landuse planning system, the SPP's proposal that authorities focus on 'what might be expected to be achieved from offshore renewables closest to where electricity might be likely to come ashore' is only part of the picture. The effect which the growing contribution from renewable technologies in the marine environment will have on the expected contribution from onshore technologies is surely key to how local authorities plan for the short to medium term. The policy should be clear about the Executive's role in, and perceived timescale for, determining these factors.

### **Local contributions in context**

Within that context, we welcome the intention that local contributions towards national targets will be determined by local authorities in consultation with others. This can then combine the important expertise and knowledge of local factors with relevant neighbouring authority data and with strategic national considerations. We welcome the inclusion of a map which shows natural and cultural heritage sites, although it is important that the map should also include Scotland's only internationally designated landscape, the St Kilda World Heritage Site.

### **Adopting an energy hierarchy**

Within the context of a Scottish Energy Strategy, we encourage the Executive to incorporate the energy hierarchy adopted in the Strategic Environmental Assessment of the Scottish Climate Change Programme into SPP6 in order to rationalise the policy approach which planning authorities take. The

hierarchy sets out different options for delivering carbon reductions, with those at the top having least risk of adverse social and environmental impact. All elements of the hierarchy must be pursued but capacity should be taken up in the top elements to prevent environmental conflicts when setting targets for those elements lower down the hierarchy. This, we feel, is helpful in ensuring the Scottish Executive meets its energy generation and climate change targets without environmental harm, and it could readily be adopted by local authorities when producing their own strategies and policies.

<b>Energy Measure</b>
<b>Conservation and avoidance</b> energy management systems to control lighting, heating etc
<b>Energy efficiency</b> (including insulation, efficient building design, energy efficient appliances)
<b>Micro-renewables and micro-CHP</b> Household / development scale incl CHP boilers, rooftop turbines, heatpumps, pv, solar thermal etc <ul style="list-style-type: none"> <li>• Heat</li> <li>• Electricity</li> </ul>
<b>Macro-renewables Community scale</b> wind, biomass, hydro etc <ul style="list-style-type: none"> <li>• Heat</li> <li>• Electricity</li> </ul>
<b>Macro-renewables Commercial scale</b> wind, wave, tidal, biomass – avoiding areas of environmental sensitivity <ul style="list-style-type: none"> <li>• Distributed Generation</li> <li>• Grid based Generation</li> </ul>

### **Micro-renewables**

We welcome the policy’s positive approach to micro-renewables and support full complementarity with other strategies to help cut energy-related emissions from the heating and lighting of buildings. In answer to the consultation question on minimum policy standard for onsite renewable energy equipment, we propose that the Executive should go beyond the percentage indicated, for which no rationale is given, towards 20%, and that this should be applied to all new buildings and all building conversions. That could be achieved easily through a combination of energy-efficient building design and the full range of micro-generation technologies, including heat pumps, solar water heating, biomass boilers, photovoltaics and micro-wind turbines. We recommend that the policy should indicate that the target will be increased over time as developers become comfortable

with the technology. For the benefit of developers who are working to various regulations, it is worth highlighting that many local authorities have already produced good supplementary planning guidance along these lines, for example the London Borough of Merton – see <http://www.merton.gov.uk/living/planning/plansandprojects/10percentpolicy.htm>

### **Locational considerations**

We are pleased with the ‘areas of search’ approach proposed, which should help to guide development to appropriate locations, and we particularly welcome the requirement that local authorities indicate areas where specific onshore wind farm developments should be avoided. From the conclusions of the Garrad Hassan research commissioned by the Executive, it is clear that given Scotland’s renewables capacity we will be able to meet current targets many times over without damaging our important habitats and landscapes.

### **Natural heritage and landscape**

However, we are concerned that the provisions relating to the natural heritage at para 21 have been amended from earlier drafts, with the potential to cause unnecessary contention in the system in relation to local landscapes important to communities. We urge that the policy reverts to the wording in the March draft which stated: “Planning authorities may also, with appropriate justification, identify and protect other areas of local landscape, wildlife or recreational value.” This point should also be included in the SPP Principles para 9, final bullet point, where again we urge use of the wording in the March version, ie: “minimising impacts on local landscapes and communities, tourism, aviation and recreational interests”.

The SPP should state that, as a priority habitat under the EU Habitats Directive and a Biodiversity Action Plan priority, all areas of active blanket bog should be explicitly avoided for windfarm development. This would be consistent with Forestry Commission policy which protects such areas from tree planting.

### **Historic environment**

We remain concerned that the policy’s provisions for the historic environment are not adequate. We welcome the reference at para 23 to NPPG5. However, it is also important that para 9 bullet 6 includes historic environment in the list of local resources on which impacts are to be minimised, and that the importance of local landscapes is referred to in the

context of the UK's commitment to the European Landscape Convention. In terms of development planning, it is important that bullet 4 of para 47 specifies cultural heritage and landscape values and in various places, eg para 21, the SPP's implication that landscapes are purely natural heritage should be amended in accordance with the Convention. This applies also to the map at Annex A where NSAs are shown as 'natural heritage designations'; it would be appropriate for the map to indicate that these are landscape designations covering both natural and cultural values. As indicated above, it is important that the map should include St Kilda.

### **Ensuring realistic targets**

We remain concerned that the policy does not adequately outline how the Executive will respond to any local authorities which may set unrealistically low or high targets. Assuming the Planning Bill is passed and local authorities are required to take on board Reporters' recommendations, then the setting of renewables targets would appear to be something that can be explored during the examination of a development plan. In the interim, it would be helpful if the SPP could clearly state that a failure to set a realistic target may result in Scottish Ministers directing local authorities to alter, replace or prepare a local plan in order to address the requirements of the SPP (in accordance with s. 14 of the Town and Country Planning (Scotland) Act 1997). While most local authorities are likely to comply with Executive policy a few may not - so a clear reminder that this is Executive policy and not advice is required in SPP6.

### **Grid considerations**

We have noted the direction in which the complex debate over upgrade of Scotland's electricity grid is moving, and will continue to contribute to this. However, in relation to SPP6 we are concerned that the policy may prioritise potentially 'bad' schemes above 'good' ones simply because they are closer to the existing grid network and/or have a place in the grid connection queue. More specifically, we are concerned that the proposed grid capacity is based on schemes which are yet to receive planning consent, which sends a very strong message to communities and individuals that the consenting of these schemes has already been determined. The consent of Section 37 applications does not appear to be subject to any clear policy guidance; the provisions of this SPP should apply to these in exactly the same way that they apply to Section 36 applications.

### **Communities/**

## **Communities**

In relation to the consultation question on para 28 we do not believe there is a case for setting an arbitrary figure to determine what is a large-scale windfarm, nor for setting a standard separation distance from communities. It will be important that the policy recognises the difficulty in establishing buffers of separation distances for sites, species and communities and identifies that each application should be decided on its own merits in relation to the relevant factors.

Yours sincerely

A handwritten signature in black ink that reads "John Mayhew". The signature is written in a cursive style and is positioned above a solid black horizontal line.

John Mayhew  
Chair

On behalf of LINK's Climate, Landscape and Planning Task Forces and their member bodies:

Association for the Protection of Rural Scotland  
Council for Scottish Archaeology  
Friends of the Earth Scotland  
John Muir Trust  
Mountaineering Council of Scotland  
The National Trust for Scotland  
Ramblers' Association Scotland  
RSPB Scotland  
Scottish Wild Land Group  
Woodland Trust Scotland  
WWF Scotland