SCOTTISH EXECUTIVE
Development Department

Planning

Draft Scottish Planning Policy (SPP) 6: Renewable Energy Analysis of Consultation Responses

Draft SPP6 was published in July 2006 with comments invited by 20 October 2006. 1020 responses were received during the consultation period. Geoff Peart Consulting was awarded a contract to analyse and report on the main issues arising from the responses. Charles Tibbles Planning provided assistance with the analysis. Around 800 of the responses were specific to 3 campaigns. The issues raised by these campaigns, and the interest each one generated, will be taken into account by the Executive. However, as the content of campaign responses was almost always identical, the primary purpose of this report is to highlight the additional substantive comments made by other respondents.

Main Findings

- there was overwhelming support for the production of the Draft SPP and revision of policy at this time, but views were polarized as to whether the guidance was too restrictive or too permissive
- the general policy stance on renewable energy was supported but there was criticism from many quarters that there was too much emphasis on wind farms and concerns that the SEA did not consider different renewable technology mixes
- key areas of disagreement included the proposed areas of search approach for wind farm location, the weight to be attached to economic considerations and the protection afforded to landscape and areas such as Regional Parks
- views mentioned a number of times by local authorities (and some other public bodies) included resourcing implications, a desire to see a national "top down" approach to the calculation of local contributions and the lack of a clear role for Structure Plans in relation to renewable energy
- the consultation question on the definition of "large scale wind farms" generated a number of alternative suggestions, with many respondents supporting a greater separation distance from local communities than 1.5km (2-3km being most frequently mentioned)
- the consultation question on micro-renewables provision attracted a high rate of response with around half of those expressing a view suggesting that the reduction target of 10% should be more ambitious – 20% being most frequently cited
- there was considerable uncertainty and confusion about what the SPP was advocating in regard to how grid capacity and grid upgrading issues should be taken into account in both development plan and management processes.

Introduction

The aim of this research project was to provide analysis of the written responses to the Scottish Ministers consultation on Draft SPP6 which set out suggested revised policy on renewable energy development in Scotland. The analysis seeks to highlight for Scottish Ministers the key issues raised during the consultation process.

Method

Responses were recorded into a database designed to capture both general comments as well as the more specific. Comments were allocated across 80 fields, relating mainly to particular parts of the Draft SPP and accompanying Strategic Environmental Assessment. Comments outwith the scope of the SPP were also collated. Positive, negative and neutral/ mixed views were identified and grouped into to six respondent categories.

The database enabled statistical tables to be created, allowing quantitative analysis of the views expressed, including responses to the two specific questions that had been posed in the consultation document. The database also served as a tool for collating the specific comments raised by different groups of respondents.

General Observations

There was overwhelming support for the production of revised guidance, and for the broad objectives of renewable energy policy. Views differed about whether the right balance between the need to meet targets for renewable energy development and protection of the landscape had been achieved. Some felt the Draft SPP to be "all things to all people" and that a clearer set of priorities were needed. Some local authorities expressed concerns about the overall resource implications of the guidance.

SPP Principles

Nearly 80% of the responses broadly supported the general principles set out at paragraphs 8 and 9 of the Draft SPP, with business respondents having most reservations. There was some suggesting that the role of the National Planning Framework (NPF) should be further developed in this policy area.

The principle of community involvement attracted near universal support while principles expressed in relation to areas of search for onshore windfarms and consideration of economic benefits attracted more polarised views. There were split views on the weight that should be attached to public concern or support for renewable schemes.

Spatial Policies and Locational Considerations

A group of respondents felt that the SPP should have addressed the locational constraints affecting *all* renewable technologies, not just wind farms. In relation to the suggested locational criteria, the key areas of concern included the following:

- the apparent downgrading of protection afforded to locally important natural heritage sites and the absence of specific protection for Regional Parks
- the rejection of the need for "buffer zones" around major natural heritage assets, although there was also some support for this
- that 1.5km separation between wind farms and communities would be inadequate (2-3 km being preferred) and that the terms "community" and "large scale wind farm" had not been adequately defined
- "cumulative impact" was recognised as a key factor but there were views that guidance needed to be elaborated further
- that wind resource should be considered firstly at national level to minimise duplication of effort and resource implications for local authorities
- that a more strategic approach to electricity grid issues was required, with capacity and targets developed firstly as part of a national strategy, possibly via the NPF.

Biomass and Other Technologies

Most respondents supported greater emphasis on biomass and Combined Heat and Power schemes. Some considered there was undue focus to on-shore wind and sought more references to other sources of energy such as energy from waste, landfill gas, hydropower, passive solar, wave and tidal energy, as well as consideration of heat generation.

Local Contributions

There was a strong body of opinion, led by local authorities, for a "top down" approach, based on a clear national overview. There was a suggestion that indicative regional figures should be established which could then be apportioned by agreement between authorities.

There was concern that the process must not lead to further delays which would impact on market confidence. The Scottish Executive was asked to consider supporting local authorities in simplifying and expediting this process. There was concern about abuse of the process, with "balancing mechanisms" needed as well as quantification of contributions from all types of renewable technologies.

Micro Renewables

There was almost universal agreement that micro-renewables should be encouraged. Many felt the guidance should advise on the range of measures needed to reduce energy consumption and increase its effective use in buildings, as well as encouraging more sustainable forms of generation. Views were split over the use of permitted development rights to encourage micro-renewables.

Most development industry respondents raised concerns about proposed micro-renewable requirements in new developments, and the likely cost to house purchasers was frequently cited with incentive schemes being suggested.

Just over half of all responses referred to the 10% target for CO2 reduction in new development, with half of this group considering the level too low (20% being the main alternative), particularly voluntary body and individual respondents. Many suggested that targets should be seen as a minimum requirement.

There were a number of positive references to the London Borough of Merton's policy. Regarding implementation, there was little consensus regarding the most appropriate way forward and concerns were expressed about necessary skill deficiencies both within the planning profession and the building industry.

Development Planning

There was little opposition to a positive role for the Development Plan although some respondents affirmed their concerns about areas of search and local contributions and there were requests for clarification and additions to the criteria for policies.

Some local authorities and professional bodies sought a role for Structure Plans and questions about plan updating requirements and the possible role of Supplementary Planning Guidance were also raised.

Development Management

Support for the approach to pre-application discussions was fairly widespread with some asking for advice to be clarified or developed further. While few took exception to community consultation, there were concerns that such views did not always feed effectively into the decision-making process.

There was general support for the advice that the level of assessment should be related to the scale of the proposal, but there was much concern about integrity of the EIA process as applied to wind farms. Some energy businesses were concerned that the proposed risk assessments might simply raise safety fears and increase community objections.

There was disagreement about the consideration of economic impacts, some wanting a greater emphasis on this factor, others wanting it deleted altogether.

In addition to the comments on grid connection raised in relation to locational considerations, the predominant views in relation to this issue in Development Management were of some confusion or uncertainty amongst respondents.

The approach to considering applications was broadly supported by local authority, voluntary body and individual respondents, while energy businesses, public bodies and professional respondents expressed most concerns. Stronger references to consideration of adverse impacts and more guidance in relation to secondary development (construction and maintenance of access roads, cable routes etc.) were sought.

Several energy businesses thought the impact on climate change would be virtually impossible to calculate, while a voluntary body suggested it would be better framed in terms of CO2 reductions over the whole life of a project.

Most energy businesses were opposed to considering alternative proposals, arguing that would open the door to endless objections and move away from the principle of considering applications on their merits. Supporters sought a stronger approach to this within the SPP.

Issues outwith the SPP

A number of issues not directly addressed in the SPP were mentioned, often concerned with the wider energy policy agenda, such as a Scottish Energy Strategy, the need for energy conservation and efficiency, the role of coal and nuclear energy, and mechanisms for electricity grid upgrades.

Other issues included the suggested updating of planning advice for renewable energy development (PAN 45), encouragement of brownfield development, radio and television interference and third party rights of appeal .

Strategic Environmental Assessment (SEA)

The accompanying SEA attracted very little comment. One Non-Departmental Public Body was disappointed that it did not assess the environmental impact of various renewable technology mixes, and show how the Executive's 2020 target could be met with least environmental impact. They felt that the issue of greatest importance and prime public interest, was the extent to which renewable energy development should be allowed to impact upon non-designated resources. The same body suggested offering planning authorities some level of national guidance on the capacity of different parts of Scotland to accommodate renewable energy.

"Draft Scottish Planning Policy 6 (SPP6): Renewable Energy. Analysis of Consultation Responses" the research report which is summarised in this research finding, is available at:

www.scotland.gov.uk/Topics/Planning/Consultations

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