



**RTPI**

mediation of space · making of place

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Dear Ian

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

The Royal Town Planning Institute (RTPI) is pleased to have the opportunity to comment on the above consultation paper which will replace existing National Planning Policy Guidance. The Institute has a particular interest in the development of Scottish planning policy on Renewable Energy in view of the important role played by the planning system in guiding locational decisions which are often controversial, which deal with rapidly evolving technology and which are critical for the sustainable development of patterns of energy provision, livelihoods and landscapes across Scotland.

The RTPI is the UK body chartered to represent the planning profession and offers these comments from the point of view of a diverse and policy neutral professional body committed to supporting devolved government in Scotland. The Institute has 1900 members in Scotland. Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with its charter obligation to work for the public interest. As a member of the Environmental Advisory Forum on Renewable Energy, the Institute has provided comment on earlier drafts and is grateful to the Executive for the open and inclusive manner in which it has involved a range of interests in the development of this SPP.

### **General Comments**

The Institute welcomes the revision of this SPP with its emphasis on supporting a diverse range of renewable energy technologies, full engagement with the community at all stages in the

planning process; guiding developments to appropriate sites; ensuring environmental, economic and social benefits are fully exploited; whilst protecting internationally and nationally designated sites and minimising impacts on local natural heritage, communities, tourism, recreation and aviation interests. However, we remain concerned about the relations between this SPP and wider energy policies, the role of the National Planning Framework (NPF) in guiding spatial aspects of renewable energy policy; the need to provide more detailed guidance on policies with regard to landscape; the arrangements for upgrading grid transmission proposals; and the need for ongoing support for planning authorities in building and developing technical capabilities in responding to renewable energy issues. These points are developed below under the related headings as used in the SPP.

## **Modernising Planning**

The Institute would like to see reference made to the National Planning Framework and further thought given as to how renewable energy developments will be included in the NPF, given its enhanced role and status in securing delivery of national policies and programmes. This will require a clear statement of government energy and renewable energy policy, explanation of the basis on which need is assessed for renewable energy developments, and the preferred areas of exploitation, taking into account the relative priorities of all Scotland's environmental constraints. The SPP should indicate the ways in which the NPF will provide spatial guidance at a strategic level to take into account matters such as the national and international designations given at Annex A and the patterns of grid capacity anticipated over a specific time.

## **Spatial Planning**

The lack of any strategic policy context within which renewable energy proposals may be considered remains a key concern. The Institute considers that there is a need to set this SPP within the context of a wider Scottish Energy Strategy to include offshore as well as onshore renewables, energy conservation, micro-renewables and the associated grid infrastructure.

The SPP is clearly written for the statutory planning system only. However, the relations between the statutory planning system and other spatial planning instruments are becoming increasingly blurred. The Institute welcomes the statement that the policies in this SPP will also be applied to the authorisation of onshore electricity generation schemes under Section 36 of the Electricity Act 1989. However, we consider that these principles should also be applied to Section 37 applications and to the future planning of grid provisions. The SPP might also address links with spatial patterns emerging from offshore licensing and regulation of renewables and from the Electricity Act consent procedure for generating stations and high tension lines.

## **Communities**

A particular issue raised in the draft SPP is that of a proposed standard separation distance of 1.5 km between the edge of settlements and wind farm developments of over 20 MW defined as 'large-scale wind farm developments'. This raises a number of issues relating to scale of development, nuisance and settings. For instance a single turbine within the suggested stand-off distance could give rise to concerns for residents in settlements of single dwellings. A preferred approach might be to set a minimum stand-off distance between commercial scale turbines and neighbouring property and to establish related criteria in relation to size of turbines, landscape, topography, electromagnetic interference etc. Further consideration may be necessary regarding definitions of 'large-scale' developments in view of new proposals regarding development hierarchies. Definitions of commercial scale should be in line with other legislation and regulations such as the Environmental Impact (Scotland) Regulations 1999. Such definitions should also reflect technological advances in recent years.

## **Development Planning**

The Institute welcomes the provisions relating to the natural heritage, the reference to NPPG 14 and the map of internationally and nationally designated sites in Annex A. Some reference might also be made to the fact that developments that have an effect on these sites but which lie outside their boundaries will also be subject to the same obligations as set out in NPPG 14 and in the Birds and Habitats Directive. There is a need to take into account the effect of proposed wind farms which, while outside National Parks, may have an impact on the setting of these designated areas. Difficult issues will remain in relation to how to assess the direct and cumulative impacts of wind farms outside the boundaries but with significant visual impacts on areas such as National Parks and National Scenic Areas. Further guidance might also be given in relation to impacts on wild land and to policies relating to the settings of other landscape features such as designated gardens and designed landscapes and with regard to cumulative effects on landscapes of local importance.

The Institute supports the identification of broad areas of search and the development of criteria based policies as outlined in paragraph 47. However, the Institute suggests that the phrase 'judged on their merits' used in paragraph 47 bullet point 5, might be replaced by a new form of standard wording 'judged against a set of material spatial planning policy criteria which apply to development proposals in appropriate areas identified in the plan'.

## **Micro-Renewables**

The Institute notes that the Scottish Executive is minded to require planning authorities to ensure that certain new developments include on-site renewable energy equipment to reduce predicted annual CO<sub>2</sub> emissions by a given percentage and would welcome views on adopting 10% as a minimum policy standard; on the developments this should apply to; and on the manner of its implementation. In general, the Institute supports the 10% target. However, we consider that policies with regard to micro-renewables should be closely linked to policies on energy conservation implemented through building control measures and encouraging low-carbon approaches to building design, resulting in minimal heat and power requirements. This emphasises the need to reduce energy consumption rather than investment in on-site generation. This matter needs to be approached through a wider range of measures that include design, construction and operation of buildings. Renewable energy generation would be only part of such measures which could be set out in sustainable design guidance.

The Institute would not support permitted development rights for all forms of micro-renewables and the visual impact and noise implications of wind turbines would be a particular concern. The policy framework should be set out in Development Plan (Local Plan) Policies, with implementation undertaken with Building Control Authorities, which are better placed to assess building energy requirements, the scale of installation required and to advise on technological aspects of installation.

## **Electricity Grid**

The Institute recognises the need for greater integration of the planning of renewable energy developments together with transmission grid upgrades as approved by Ofgem. It is not the purpose of the planning system to determine issues of need but to provide a manner in which needs can be provided for through plans for the efficient use of land, which also respects environmental constraints. The upgrading of the Beaulay-Denny line clearly illustrates the difficulties faced here as this is generally regarded as a 'planning' inquiry and yet is held under legislation which primarily promotes the interests of energy policy and which is not covered by this SPP. This public inquiry lacks access to any form of suitable plan at a national scale to provide a context for the decision which Ministers are being asked to make. Any decision can only be reactive to the expedient of upgrading the line which already exists, and which was never designed to service the dispersed generation opportunities for renewable energy, nor

mass export of electricity outwith Scotland. The application of the principles as set out in this SPP to Section 37 applications would improve the connectivity between these planning systems, the separation of which at this current time serves to undermine objectivity in public inquiry procedures.

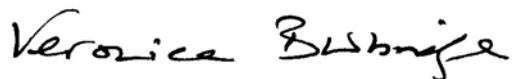
### **Additional points**

The consultation also raises issues about the technical capacity of local authorities to undertake some of the assessment that is necessary for example in assessing local contributions. This is logical but it presumes a level of skill etc that in many cases may not be available and there is a need to address continuing professional development as well as available data and information systems to underpin this area of work. Further work led by the Scottish Executive and within the NPF framework might create an up-to-date picture of the potential renewable energy yield from the full range of available technologies together with reference to current and emerging development plans. In the future, this might provide a basis for assisting in the assessment of future investment plans. The resource implications need to be fully considered and planning authorities might be encouraged to work together in drawing up their assessments and policies related to renewable energy to make the best use of expertise available. This collaboration may facilitate joint staff training and development with cost effective input from external advisers and consultants.

The Institute also suggests that further consideration should be given to updating PAN 45 with regard to more detailed guidance on biomass and heat and power combustion plants, and on issues arising from the increased scale of new wind turbines and emerging onshore and offshore technologies.

The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way. Should you wish any clarification please do not hesitate to contact me at the above address or by email: [veronica.burbridge@rtpi.org.uk](mailto:veronica.burbridge@rtpi.org.uk)

Yours sincerely



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