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| Issue 25 | Renewable Energy | |
| Development plan reference: | <u>Chapter 5 Supporting Policies</u> Policy RW01 Renewable Energy (page 69) | Reporter: |
| Body or person(s) submitting a representation raising the issue (including reference number): | | |
| <p>Scottish Renewables (00002) The Banks Group (00477) S Singh (00397) SEPA (00968) Captain: The Clean Energy Project (01275) Forth Ports plc (00020)</p> | | |
| Provision of the development plan to which the issue relates: | Policy RW01 on renewable energy and the relationship of the LDP with supplementary guidance in relation to the spatial framework for onshore wind energy | |
| Planning authority's summary of the representation(s): | | |
| <p><u>Policy RW01 – Renewable Energy</u></p> <p>Scottish Renewables (00002/2001/001):- Concern is expressed at the lack of detail in Policy RW01, particularly as it relates to types of renewable energy other than wind. The SPP states that development plans should identify sites with the potential to accommodate biomass and hydro, and identify the factors that will be considered when making decisions on planning applications.</p> <p>Scottish Renewables (00002/2001/002):- Scottish Government guidance states that local authorities should develop policies which support the development of heat networks and heat derived from efficient, low carbon or renewable sources, giving consideration to the co-location of heat emitters and heat users. Development plans should also contain policies which encourage proposed development to either connect to existing or heat distribution infrastructure or to be designed so they are capable of being connected in the future.</p> <p>Forth Ports plc (00020/2002/005):- Policy RW01 should be expanded to include other low-carbon energy technologies such as the coal gasification plant proposed for Grangemouth. The policy should also encourage the development of heat networks. Both these aspects are supported by the draft NPF3 (CD05).</p> <p>Forth Ports plc (00020/2002/002):- Policy D04(3) should be included in Policy RW01 to ensure that decentralised energy generation and the development of CHP/heat networks across the plan area are supported rather than just those associated with new development.</p> | | |

SEPA (00968/2001/009):- Policy RW01 should be extended to include low carbon energy. Development plans should support a mix of energy generation technologies that includes renewable and low carbon sources, e.g. using technological solutions such as carbon capture and pumped hydro.

Captain: The Clean Energy Project (01275/2001/003):- Policy RW01 should refer to 'energy generation' rather than just renewables, given the potential for clean coal based generation (using coal gasification systems). Even with the ongoing push toward renewable energy, a baseload capacity from conventional fuels is required to maintain security of supply. Captain: The Clean Energy Project have submitted a number of supporting documents including community engagement material and a site plan (RD25.1-RD25.4).

The Banks Group (00477/2001/002 & 003):- Policy RW01 is welcomed. However, there should be a spatial strategy plan produced for renewable energy, similar to that produced for mineral resources (Map 5.1, page 70). It is also suggested there should be reference to renewable energy on the Strategic Infrastructure plan (Map 3.2, page 13).

Relationship with Supplementary Guidance

The Banks Group (00477/2001/004):- A lot of weight appears to be being placed on the Wind Energy Development Supplementary Planning Guidance (SPG). Due to the interrelated nature of the Proposed Plan and SPG it would have been advantageous if these documents could have been consulted on concurrently to allow a fully understanding of the emerging policy.

Scottish Renewables (00002/2001/003):- Scottish Government guidance states that spatial frameworks for onshore wind should form part of the Development Plan rather than interim supplementary guidance. The Council's preparation of their spatial framework as supplementary guidance, as set out in paragraph 5.121 is contrary to this advice.

S Singh (00397/2002/001):- The Slamannan Plateau has been the subject of coal and wind energy proposals but should be considered as a wildlife habitat and protected. Commercial wind turbines should be sited more sympathetically away from bird life and 2.5km from any homes.

Modifications sought by those submitting representations:

Policy RW01 – Renewable Energy

Scottish Renewables (00002/2001/001):- Amend Policy RW01 to specifically include hydro and biomass and set out criteria for these types of development.

Scottish Renewables (00002/2001/001):- Amend Policy RW01 or include an additional policy to specifically address renewable heat and the development of heat networks.

Forth Ports plc (00020/2002/005):- Amend Policy RW01 to include reference to

other low-carbon energy technologies such as the coal gasification plant proposed for Grangemouth, and the development of heat networks.

Forth Ports plc (00020/2002/002):- Amend Policy RW01 by inserting sub-section (3) of Policy D04 and make it clear it that it is not just associated with new development.

SEPA (00968/2001/009):- Amend Policy RW01 by changing the title to read 'Renewable and Low Carbon Energy'; and sub-section (1) to read 'Renewable and low carbon energy developments will be supported...'.

Captain: The Clean Energy Project (01275/2001/003):- Amend the title of Policy RW01 to 'energy generation' and delete the word 'renewable' in part 1 of the policy.

The Banks Group (00477/2001/003):- Insert a new Spatial Strategy Plan relating to renewable energy and include renewable energy on Map 3.2.

Relationship with Supplementary Guidance

Scottish Renewables (00002/2001/003):- Include the required spatial framework for onshore wind within the LDP.

S Singh (00397/2002/001):- Include statement that all commercial sized wind turbines should be at least 2.5km away from homes and be subject to the further factors noted in the LDP. Remove any reference to the Slamannan Plateau as an area for energy development.

Summary of responses (including reasons) by planning authority:

Policy RW01 – Renewable Energy

Scottish Renewables (00002/2001/001 & 002); Forth Ports plc (00020/2002/002 & 005); SEPA (00968/2001/009); Captain: The Clean Energy Project (01275/2001/003):- These representations seek to expand the scope of Policy RW01 in three broad ways:

- Extending it provide more detailed guidance on other forms of renewable energy, other than wind, specifically hydro and biomass;
- Extending it to deal with energy generation more generally and specifically to provide reference to, and support for, other low carbon energy generating technologies; and
- Extending it to cover the development of renewable heat and heat networks

With regard to other renewable technologies, the Council considers that the scope of Policy RW01 is appropriate, and that further detail on hydro and biomass is not necessary. The Council has comprehensively assessed the renewable resource in the area, as set out in Technical Report 8 (CD29), and has concluded that technologies such as hydro and geothermal are primarily exploitable at a smaller-scale, community or domestic scale. It is not considered appropriate or indeed possible to identify specific locations for non-wind renewable energy

development, or necessary to set out specific criteria for such development. Policy RW01 provides general support for these other forms of renewables, subject to assessment of environmental impacts. The criteria for assessing these impacts are contained in the environmental policies of the LDP.

With regard to broadening the scope of the policy to embrace energy generation generally, this is not the purpose of Policy RW01, whose specific focus is renewables. The scope of other low carbon energy generation technologies is potentially very broad, including large complex projects such the coal gasification plant promoted by Captain: The Clean Energy Project. It is more appropriate to consider these projects on their merits, assessed against the other general policies of the LDP.

With regard to the inclusion of reference to renewable heat and heat networks, this is acknowledged to be an important strand of the Scottish Government's renewable policy. The Council has included support for these initiatives in Policy D04(3). This is an appropriate place for it, and there is no need to duplicate the policy in RW01.

For these reasons, the Council does not agree to modify the plan in response to these representations.

The Banks Group (00477/2001/003):- The Council does not consider it necessary to provide a strategy plan to support Policy RW01, or to include renewable energy on Map 3.2. The spatial framework for wind energy developments will be set out in supplementary guidance, in a similar form to the current wind energy SPG (CD132), and this is considered to be the best place for this information. Because this supplementary guidance will be prepared after the submission of the proposed LDP to the Scottish Government, there has not been an opportunity, in any case, to include the information within the proposed LDP. There are no other aspects of renewables policy that have a spatial dimension that could be represented on a strategy plan. For this reason, the Council does not agree to modify the plan in response to this representation.

Relationship with Supplementary Guidance

Scottish Renewables (00002/2001/003):- In May 2013, the Council approved a Spatial Framework and Guidance for Wind Energy Development as non-statutory SPG (CD132). The intention is to revise this and take it forward as a statutory supplementary guidance in association with the LDP. This proposed SG is referenced in Policy RW01, and is listed in Appendix 3. As statutory supplementary guidance, the spatial framework will therefore form part of the development plan, as required by the SPP. The timing of the SG, which is expected to be prepared in the latter part of 2014, will allow any changes to the SPP, due to be confirmed in June 2014, to be incorporated in the methodology for preparing the spatial framework. For this reason, the Council does not agree to modify the plan in response to this representation.

The Banks Group (00477/2001/004):- The comment on the timing of the preparation of supplementary guidance, with respect to the LDP, is noted.

However, the Council considers that there are advantages to separating the two processes, and that stakeholders will not in any way be disadvantaged by the separation. Full opportunity to comment on the supplementary guidance will be afforded to all parties. Moreover, delaying the timing of the SG, which is expected to be prepared in the latter part of 2014, will allow any changes to the SPP, due to be confirmed in June 2014, to be incorporated in the methodology for preparing the spatial framework.

S Singh (00397/2002/001):- The issues raised by this representation will be dealt with through the proposed supplementary guidance, which is referenced in Policy RW01, listed in Appendix 3, and will be prepared during the latter half of 2014.

The current Spatial Framework and Guidance for Wind Energy Development (CD132) sets out key areas which require protection, those which are subject to constraint and those where wind energy can potentially be accommodated as well as providing guidance on specific issues such as ecology and noise. This will provide the basis for the proposed statutory supplementary guidance, which will continue to ensure that wind energy is directed to the most appropriate locations. In response to the issue of commercial turbines being located 2.5km from homes, the current draft SPP (CD02) states that there should be a 2.5km separation distance between wind farms and communities. The SG will reflect the requirements of the SPP once it is finalised.

For this reason, the Council does not agree to modify the plan in response to this representation.

Reporter's conclusions:

Reporter's recommendations: