

**Consultation on SPP6 Renewable Energy:  
Consultation Draft  
A response from Friends of the Earth Scotland**



**Friends of  
the Earth  
Scotland**

6 October 2006

Sandra Carey  
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Dear Sandra,

**Friends of the Earth Scotland SPP6 Response**

**Introduction**

Friends of the Earth Scotland (FoES) is an environmental charity founded in 1978 and an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability.

We have campaigned successfully for the rapid adoption of renewables in Scotland and have recently focused our work on making the case for swifter adoption of micro-renewables. On the 15<sup>th</sup> of September we hosted a major conference where over 80 delegates including local government officer, house builders, manufactures and the NGO sector representatives discussed how to better promote the rollout of small scale-renewables. Evidence from speakers and delegates on planning matters have informed our comments on the micro-generation section of the SPP.

**Key points**

We welcome the opportunity to respond the Scottish Executive's consultation on planning for development of the renewable energy sector. The key points to note are as follows:

1. The focus on a strategic approach, led through development plans at a council level, is welcome and needs immediate rollout to create a consistent framework for the rapid development of the renewable energy sector in Scotland.

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2. We support placing a responsibility on local authorities to find suitable locations or 'preferred areas of search' for wind farms. However additional resources and expertise may need to be acquired for this to be done effectively and within a reasonable timeframe.
3. Obliging local authorities to set local contributions to national targets for renewable energy in GW of capacity is welcome. However, further clarification is required on how this will operate in practice, particularly in relation to equitable contributions. Parallel targets for micro generation should also be established to assist in monitoring the impacts of the new policy.
4. We believe that the guidance, if applied appropriately, contains sufficient safeguards in terms of nature and landscape conservation. We note that the consistency, operation and effectiveness of some designations at a local level need to be reviewed more generally not just in relation to renewables.
5. A commitment to require on-site renewables in new developments is very welcome and should apply to all new residential developments and all commercial developments, with an on-site contribution delivering 20% reduction in the building's CO2 footprint compared with projected emissions prior to the application of the technology. This must be over and above, the minimum compliance level set by building regulations.

## **SPP6 Main Issues**

### **1. Support for the continued growth of renewables**

It is widely accepted that Scotland has highly favourable conditions for renewable energy generation and has a strategic advantage compared with other nations in terms of the available resource<sup>1</sup>. Using the planning system to facilitate the growth of the renewables sector will form a vital component in Scotland's efforts to meet meaningful greenhouse gas emissions reduction targets. It has been demonstrated that through strategic planning and the avoidance of sensitive sites that substantial environmental benefits, especially emission reductions, can be achieved. We welcome the intention that the planning system should facilitate the early realisation of the 40% target prior to 2020.

### **2. The strategic approach land use plan based approach**

In theory (but often not in practice) the development plan system provides opportunities for communities and other stakeholders to influence and participate in decisions affecting the development of their areas. Clearly the development of the renewables sector should be integrated into this process, so we welcome this as a core principle set out in SPP6, and the enhanced focus on forward planning.

We are however concerned that, to date, the preparation and approval of plans have been slow and levels of publication participation limited. This SPP will therefore only be deliverable if more resources are allocated to facilitate faster and more inclusive development planning. To date the industry has moved far faster in proposing new sites

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<sup>1</sup> Garrad Hassan & Partners Ltd (2001) Scotland's Renewable Energy Resource, Scottish Executive

than the planning departments have in developing appropriate supplementary guidance and this must change.

### **3. Local targets and shares**

Every council should contribute to national efforts to address the causes of climate change and the rapid development of renewable energy technology (in conjunction with ambitious action on energy efficiency) is a useful means of addressing this growing challenge. We note that council contributions, as proposed, are based on the available local resource in terms of supply, not on a per capita basis in terms of demand, which is logical but a potential source of tension.

Targets or shares must be carefully developed especially through cooperation with councils with a large land resource and low population densities, and hence enhanced scope to develop certain types of renewables. Meanwhile, other areas with higher population densities and higher energy demands must deliver other solutions such as community based combined heat and power. In this regard we foresee an advisory role for the National Planning Framework to provide a steer to local authorities on their potential to support national targets and what constitutes a reasonable fair share.

Secondly, we strongly believe that councils should set separate targets for installed micro-generation capacity, based on carbon reductions. This measure would be particularly appropriate in large urban centres, where opportunities to deploy larger scale renewables are more limited. Whilst not all renewable micro-generation technologies need planning permission, developers would still have to demonstrate to local authorities they had met requirements for onsite generation set out in SPP6. In this regard it is important that planning authorities monitor the number of new developments incorporating micro-renewables to determine their contribution to wider climate change targets.

In relation to setting the right level for targets, we strongly advise that local authorities should base their policies on facilitating the achievement of the UK government's long-term climate change goals, commensurate with meeting at least a 60% reduction of CO<sub>2</sub> by 2050. In this regard, it should be noted that this target is now being seen as insufficient if dangerous and irreversible climate change is to be halted.

In relation to paragraph 41 we believe that the contribution target should reflect the maximum available resource in terms of suitable areas of search, excluding sensitive sites, and taking account of the need to manage cumulative impact to determine an area's carrying capacity. This should be based on current levels of consents and environmental factors and a realistic appraisal of prospects for grid connections to avoid creating arbitrary ceilings. As worded paragraph 41 could undermine the plan-led approach, which should surely be about predicting and accommodating the appropriate level of capacity.

We also have concerns that the process maybe dictated by the available grid connections rather than finding the sites of least impact then upgrading the grid accordingly. In this regard more forward planning is required in advance of deciding Section 37 consents for transmission infrastructure, which do not appear to be covered by this guidance.

#### **4. Environmental protection**

Renewables have a lower environmental impact than other forms of conventional energy production, especially in relation to global emissions, air pollution and resource use. Deployment of technology such as hydro or wind turbines can, if sited poorly, have impacts on biodiversity and landscapes recognised for their aesthetic qualities. We support the recognition of the importance of these factors in paragraph 20 – 22 of the draft.

Apart from micro-generation, small scale and community-based projects FoES believes it is neither necessary<sup>2</sup> nor appropriate to proceed with developments in areas designated for their national or international natural heritage importance. With regard to national parks we believe that these should establish themselves as centres of excellence for smaller scale and community based renewables, given the park authorities wider environmental responsibilities.

We therefore welcome the prospect of a strategic approach to finding suitable sites out with areas already designated for their international and national importance, both to avoid unnecessary conflicts and provide greater certainty for developers. Whilst the designation of blanket buffer zones around such designated areas may not be appropriate in all cases, as indicated in paragraph 22, there should still be policies which recognise the need to minimise cumulative impact around the fringes of designated areas, a point on which SPP6 could be more specific.

Where other areas are identified for their local value these should only be excluded after the consistent application of robust criteria and up to date data to determine the key characteristics of value that require protection as well as a sensible basis for considering whether mitigation measures will prove effective. In this respect, setting out and providing justification for such local designations, as set in paragraph 21, should be emphasised. We would therefore welcome the early review and revision of NPPG 14 Natural Heritage to ensure it is effective in resolving issues of site protection and development pressures for all developments, not just renewables.

#### **5. Micro scale renewables (consultation question)**

We strongly support the policy outlined in paragraph 46 concerning the promotion of micro-renewables. We note that the guidance is timely, as 170 councils in England already have (or are developing) similar policies, the first of which was put in place by Merton Council in October 2003. To maximise the effectiveness of the policy we strongly recommend that the following elements are reviewed and enhanced:

1. Ensuring that certain developments include onsite renewable energy equipment, which we believe must apply to all new domestic dwellings and all commercial and industrial developments, including renovations and conversions, as well as new-build. Whilst these thresholds are higher than those set in earlier policies in England, it is important to remember that the Merton rule is now well established and plans are already in place to extend it beyond what was, after all, only a starting point. In this respect, one authority, North Devon, has already has policy covering all developments in its adopted local plan. Any sq ft threshold for non-residential developments would be entirely arbitrary and could lead to developers proposing

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<sup>2</sup> Ibid 1

buildings slightly below the established cut-off or even phasing projects as an avoidance measures.

2. Reducing predicted CO2 emissions by a given percentage, which we believe should be at least 20% (over and above building standard requirements) in the first instance, then rising rapidly over time. The need for more ambition reflects the novelty of the earlier English policies and the fact that they are already being toughened up by a number of authorities according to a recent survey by the Town & Country Planning Association<sup>3</sup>. 20% would create a much greater incentive, and in some cases a requirement, to maximise the energy efficiency of new buildings – an area where Scotland still does not match the standards set in other North European countries.

We also believe that it is essential that this policy should explicitly specify a requirement that the CO2 emissions savings should be *over and above* those required through Building Regulations.

In relation to paragraph 46 we believe that greater care is needed with the wording of the final sentence which says the policy should be “applied to developments where the installation of renewable energy generation equipment is viable, given the type of the development proposed, its location, and design”. This could create a perverse incentive for unscrupulous developers to propose poorly located and designed buildings, which reduce the potential viability of micro-renewables. Instead, recognising the diversity of technologies available, the policy should require developers to design low carbon energy efficient buildings from the outset that makes achieving the required percentage of carbon savings from micro-generation viable and achievable.

Where, in exceptional circumstances, it is not possible for the target percentage to be achieved or exceeded, which is unlikely given the range of technologies available, developers should be required via a Section 75 agreement to contribute to the development of community renewables off-site to achieve the requisite carbon savings. Such a policy would also ensure that all developments ultimately deliver the + 20% figure, whilst also hastening the wider roll out of renewables within the community.

Paragraph 46 might be amended to read:

*“Development plan policies should require developers to design low carbon, energy efficient residential and commercial buildings, which incorporate onsite renewable energy generation of heat or electricity to reduce predicted CO2 emissions by more than 20%, beyond those savings already achieved under Building Regulations. In exceptional cases where the developer can demonstrate that this is not achievable, councils should enter into planning agreements to promote micro-renewables in the wider community which will secure equivalent or greater carbon savings.”*

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<sup>3</sup> Town & Country Planning Association (2006) Using the Merton Rule: Report of a TCPA survey of local authority planning departments in England, July 2006

As emphasised previously we believe that it is necessary for councils to set targets for micro-generation for their area in addition to those for wider renewables.

It should be up to the developer's discretion to determine which technologies to employ to meet the required percentage, however it would be advisable to set out what are accepted renewable micro-generation technologies.

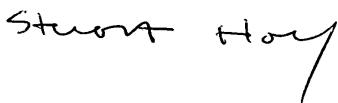
Authoritative research undertaken by the University of Oxford, into achieving the 60% CO2 savings from the residential sector, shows that because of low turnover in the average age of the building stock, it is vital to achieve the early and maximum uptake of micro-renewables as soon as possible<sup>4</sup>. When considering longer term climate change targets, + 20% seems a modest starting point given that across the whole housing stock Low and Zero Carbon Technologies (LZCT), including renewables, will need to deliver in the region of 80% of heat demand and 100% of electricity by 2050<sup>5</sup>. In this respect the research "concludes the targets are challenging but feasible, if government starts now"<sup>6</sup> including measures to promote the rapid adoption of micro-renewables. Conversely, a less than ambitious target today will have long-term negative implications and costs in terms of cutting emissions from the residential sector in the future.

Finally it should be noted that developers and councils already deliver this policy in many English Council areas – this demonstrates that it is both practical and affordable and that the technology is available. In this respect there is considerable, and growing body of best practice to draw on to allow the smooth implementation of the new policy across Scotland.

## Conclusions

We are generally supportive of the approach proposed in SPP6 which we hope will be rolled out swiftly after considering the minor amendments recommended in this response. In particular the proposals for small-scale renewables are most welcome and will allow Scotland to catch up with and possibly overtake recent developments south of the border.

Yours sincerely



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<sup>4</sup> Boardman B, Darby S, Killip G, Hinnels, M, Jardine C, Palmer and Graham Siden (2005) 40% House, Environmental Change Institute, University of Oxford

<sup>5</sup> Ibid 4 p72 & p90

<sup>6</sup> Ibid 4 p84