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**SCOTTISH EXECUTIVE DEVELOPMENT DEPARTMENT  
CONSULTATION:**

**DRAFT SCOTTISH PLANNING POLICY (SPP) 6:  
RENEWABLE ENERGY**

**SUBMISSION BY  
SCOTTISH ESTATES BUSINESS GROUP**

**6<sup>th</sup> October 2006**



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**1. BACKGROUND**

The Scottish Estates Business Group (SEBG) represents a group of progressive land-based estates with significant agricultural and rural business interests. It aims to promote a modern business approach in the management of Scotland's land resource in ways which deliver social, economic and environmental benefits. The group seeks to secure a sustainable and prosperous future for rural areas.

Estates are proven business models that assist the development of smaller rural businesses, and landowners and estates have a vital role to play in the ongoing and future development and prosperity of Scotland. SEBG is committed to rural economies and its members work hard across Scotland across Scotland to stimulate enterprise and economic development.

**2. OVERVIEW**

SEBG welcomes the opportunity to comment on the Draft Scottish Planning Policy 6: Renewable Energy. With increasing awareness of climate change and greater understanding of and government commitment to the need to cut carbon emissions, the merits of “green” energy technologies are becoming much better understood and appreciated. Recent increases in energy costs as well as concerns for the security of energy supplies have fueled greater interest in and commitment to increased use of renewable forms of power, whether for electricity, heat or transport.

The Group favours a balanced energy policy for Scotland, with a range of alternative sources of renewable energy playing their full part in meeting Scotland’s electricity, heat and transport fuel needs. Scotland’s rural sector in general and its landowners and land managers in particular have a positive and constructive role to play in the development of a secure energy supply, with the business side of renewable energy offering potential for traditional farmers and forest managers to become “energy managers”.

However, if Scottish Ministers’ target of 40% of Scotland’s electricity from renewable sources by 2020 is to be met, Scotland’s planning system must be able to recognise the strategic as well as local merits of individual renewable energy projects and to bring a pragmatic rather than restrictive approach to applications for planning consent. SEBG therefore firmly welcomes the explicit guidance contained in Draft SPP6 that Ministers expect planning authorities to make positive provision for renewable energy developments.

Further, SEBG welcomes explicit recognition of the role small scale renewables schemes can play in bringing benefits to rural communities and offering opportunities for local enterprise. This is one area in particular in which estates are well-placed to support drives to meet Scotland's renewable energy targets, working in partnership with their local communities.

### **3. SPECIFIC COMMENTS ON SPP6 CONTENT**

#### **i. SPP PRINCIPLES**

SEBG welcomes recognition of the need to focus on facilitating progress towards the national 40% target. If the target is to be met, then it is vital that planning authorities give full consideration, economic and social as well as environmental, to those projects which are likely to be able to contribute to its achievement. The Group firmly supports the principles set out in paragraph 9 of the Draft SPP6 which, it believes are appropriate and should underpin the way in which planning authorities carry out their planning responsibilities.

##### ***Site selection***

It would be helpful to both developers and local communities if planning authorities were to set out explicit frameworks against which proposals for renewable energy developments were to be considered. The identification of areas of search for onshore wind farm developments would help to clarify where such developments may or may not be acceptable. This greater clarity about the potential of an area for development would also facilitate attempts to build local consensus about the merits or otherwise of proposals.

##### ***Local communities and renewable energy***

SEBG agrees that it is important that local people are able to engage actively in the development of renewable energy schemes, since opinions would then be based on accurate information rather than misinformation or speculation. Local communities should be involved by both developers and planning authorities at all stages of the planning process, particularly where there may be potential for communities to invest in and benefit from ownership of renewable energy projects or to develop their own local projects.

##### ***Economic benefits***

SEBG welcomes recognition that the planning system has a key role to play in supporting Scotland's economic competitiveness and jobs market. It agrees that scope for developments to contribute to local or national economic development priorities should be a material consideration when policies and decisions are considered. It will be of particular help to innovative local and community-supported schemes if planning authorities are encouraged to take a pragmatic and "can do" approach in the consideration of applications which have been worked up in close consultation with, and have the support of, local interests.

#### **ii. SPATIAL POLICIES**

Currently, developers are given little advance information on whether a proposed development may or not be acceptable to the planning authority until some way through the lengthy application process and after the investment of much time and effort. If developers could be given guidance at an early stage on where wind farm proposals were likely to be considered appropriate, then development opportunities could be assessed more accurately and attention more sharply focused. Similarly, developers could be steered away from those areas where wind farm developments should be avoided.

### **iii. LOCATIONAL CONSIDERATIONS FOR WIND FARMS**

The proposal that the development plan process should include consideration of potential for accommodating renewable energy technologies is a constructive one. Not only will the resultant development plan be helpful in guiding potential developers towards appropriate sites and away from inappropriate ones; it will also help to foster a positive and pragmatic approach by planning authorities and encourage them to become more receptive to proposals for appropriate development opportunities.

#### ***Natural heritage***

Estates play an important role in safeguarding and, where possible, enhancing Scotland's natural heritage. SEBG welcomes recognition that, notwithstanding the need for and potential benefits to Scotland of facilitating the development of renewable energy resources, due attention must be paid to the protection of its natural heritage, particularly those aspects which are of international and national importance. The impact of individual schemes on high quality landscapes must be carefully assessed, particularly in those cases where the distances involved are considerable. It will be important that planning authorities will be able to take a pragmatic approach in reaching an equitable balance when renewables and biodiversity objectives compete.

#### ***Historic environment***

As with natural heritage, so too do private estates and owners manage and maintain a rich variety of heritage properties and artefacts. These are frequently made available to the public as educational and tourism venues, often to the highest international standards and without public support. SEBG therefore welcomes guidance that development plan policies should set out the criteria for protecting, conserving and enhancing Scotland's historic environment.

#### ***Green Belts***

SEBG welcomes the flexibility which Draft SPP6 proposes as regards wind farm developments within designated Green Belts. The guidance should be able to accommodate exceptional circumstances, if a flexible and pragmatic approach by planning authorities is to be fostered.

#### ***Tourism and recreational interests***

Since there is an absence of information on the impact of wind farm development on tourism, the findings of research into this aspect will be helpful in assessing where in individual circumstances the balance between renewable energy requirements and the impact on tourism may lie. The Group awaits with interest the publication later this year of the findings of research currently being carried out by the Scottish Executive on the impact of wind farms in tourism. SEBG suggests, however, that there should be public consultation on how the findings might best be reflected in the final version of the SPP, since opinions may differ on its interpretation.

#### ***Communities***

The consultation proposes a separation distance of 1.5 km between large-scale wind farm developments and the edge of a town or village, with scope for developments within that distance if sited and designed to avoid unacceptable impacts on communities. It invites comment on whether "large-scale wind farms" should be specified as those over 20 megawatts. However, SEBG suggests it may also be appropriate to require visibility from residences to be considered, since topography would have a major part to play in the potential impact of a proposed development on its nearby community.

We also question whether having an arbitrary cut-off figure in defining “large-scale” would work well. It would be better, we suggest, to consider each case on its merits, bearing in mind its potential impact on the local community.

**iv. BIOMASS**

SEBG welcomes guidance to planning authorities that in all cases, development plans should confirm that the development of new biomass energy plants will be supported subject to local landscape, built and cultural heritage, amenity, environmental and transportation issues being properly addressed. This presumption in favour of suitable development will offer for potential renewable developments a measure of assurance that proposals will receive full and fair consideration, based on their individual merits and their relevance to national renewable energy targets set by Government.

**v. DEVELOPMENT PLANNING**

The specific guidance in Draft SPP6 on the elements to be included in local development plan policies makes it very clear that planning authorities should play an active role in facilitating desirable and appropriate renewable energy developments. This is very much to be welcomed since planning authorities should have an explicit rather than implicit responsibility to deliver nationally set strategic objectives.

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**6<sup>th</sup> October 2006**