

6 October 2006

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Dear Sandra

## **Consultation on draft Scottish Planning Policy 6: Renewable Energy WWF Scotland Response**

### **Summary**

- Climate change is the biggest threat we face and progressive planning policy to support renewable energy in Scotland is essential if we are to capitalise on Scotland's renewable energy potential and cut climate emissions from the power sector.
- The development plan process is a useful framework for considering proposals for renewable energy development in each local authority area.
- The identification of local contributions must reflect the Government's national targets for renewables, the urgent need to cut emissions from the power sector and Scotland's huge potential for renewables.
- SPP6 should set out that Ministers could require a local authority to revise a plan where it sets unrealistically low targets.
- The proposal that planning authorities require new developments to include on site renewable energy equipment is welcome. This should apply to all new developments and conversions, regardless of size or unit number, with a target of reducing predicted CO<sub>2</sub> emissions by 20%.

### **Introduction**

WWF Scotland welcomes the opportunity to respond to draft SPP6. Climate change is the biggest threat we face. With energy generation accounting for 37% of Scotland's direct greenhouse gas emissions the development of renewable energy is a critical component of delivering substantial reductions in carbon dioxide emissions. Progressive planning policy that supports and facilitates the development of Scotland's renewable potential is key.

We support the Executive's commitment to secure 40% of Scotland's electricity from renewables by 2020, and the view that this is viewed as a minimum rather than cap. Given Scotland's fantastic resource we are well placed to exceed this, and note the Scottish Renewables recent report suggesting a target of 54% by 2020 is readily achievable.<sup>1</sup>

Recognition in the draft SPP6 that the 2020 target be met through a mix of renewable technologies is welcome, as is the recognition of the need to move beyond simply renewable electricity and support the development of renewable heat.

### **Spatial policies and site selection (section 10 and 16-18)**

We support the proposal that the development plan process sets the framework for considering renewable energy developments, guiding proposals to appropriate locations and ensuring the realisation of the renewable energy potential within that area.

### **Locational considerations for onshore wind (section 19-35)**

As a part of the development plan process to identify most appropriate renewable energy developments we recognise the need for particular guidance to support the development of the most appropriate onshore wind farm proposals. We support the proposal that planning authorities avoid unreasonable natural heritage restrictions on the ability of an area to contribute to national targets whilst safeguarding the most important areas. We support the proposal that planning authorities should not impose additional zones of protection around areas designated for their landscape value.

In response to the question posed in section 28 we do not believe that SPP6 needs to set any specific distance in spatial policies in development plans between communities and a wind farm, instead this should be considered on a case-by-case basis as part of the individual application.

### **Biomass (section 36-37)**

Planning guidance for biomass should be aligned with the Indicative Forest Strategies being developed by local authorities. We would also propose that planning guidance supports a hierarchy of biomass priorities based on effectiveness at reducing greenhouse gas emissions and the environmental impacts of different options.

Where biomass is sourced from managed woodlands planning guidance should give preference to Forest Stewardship Council certified sources.

### **Local Contributions (section 39-43)**

We believe that the identification of contributions by local authorities towards the national targets will be helpful. We support the proposal that these be reviewed and revised regularly and that achieving the target should not be used as a reason for refusing planning permission for further renewable energy projects. However this does underline the importance of ensuring that the local authority contributions determined would satisfactorily deliver the Government's overarching target as a minimum.

We are therefore concerned however that SPP6 does not set out how the Executive would respond were a local authority to set unrealistically low targets, particularly if this were to put at risk the Government's overarching renewables target. SPP6 should state that a failure to set a

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<sup>1</sup> Delivering the New Generation of Energy: Route Map to Scotland's Renewable Future. Scottish Renewables. 2006

realistic target may result in Scottish Ministers directing local authorities to alter, replace or prepare a local plan in order to address the requirements of the SPP (in accordance with s. 14 of the Town and Country Planning (Scotland) Act 1997).

### **Micro-Renewables (section 44-46)**

We entirely support the proposal for planning authorities to require the incorporation of renewable energy on new developments. We believe that this will help stimulate a microgeneration revolution in Scotland, reducing Scotland's emissions and facilitating the development of a viable renewable energy industry with its associated economic and employment benefits. A report by the Energy Saving's Trust for the DTI has estimated that micro-renewables could provide 30-40% of UK electricity needs by 2050 and help to reduce CO<sub>2</sub> emissions by 15% per year.<sup>2</sup>

### **Micro-Renewables: A Minimum Policy Standard**

We support the proposal to set a target. The recent survey by the TCPA on the use of the 'Merton Rule' in local authority planning departments in England noted that 120 authorities have a Merton style policy adopted or in draft in their development plan and noted that 'it is critical that there is strong national leadership so that planning policies can be given due weight in decision making.'<sup>3</sup> Earlier in 2006 Westminster Planning Minister Yvette Cooper announced that Government 'expected' all planning authorities to implement Merton Rule policies. Research on mainstreaming sustainable house building in Scotland concluded that 'A direct statement in support of planning policies for more sustainable housing would heighten confidence and increase the pace of action.'<sup>4</sup>

We particularly support the proposal to set a target based on a reduction in predicted annual carbon dioxide emissions. Such a target not only acts to stimulate small-scale renewables but also to design energy efficient buildings. A target, as proposed, based on carbon reduction rather than energy is entirely in line with the latest thinking by Merton and the Greater London Authority. The particular advantages being:

- Compatibility with building regulations, which assess energy performance of buildings in terms of carbon rather than energy use.
- Compatibility with Scottish Executive commitments and targets to reduce carbon dioxide emissions as set out in the Climate Change Programme and with UK Energy White Paper aim of ensuring the UK is on a path to a 60% cut in carbon emissions by 2050.
- Avoidance of possible anomalies e.g. developers opting to install cheaper and more carbon intense all-electric heating.<sup>5</sup>

We propose that SPP should set a target of 20%, in line with the commitment made in 1997 by the UK Government to reduce carbon dioxide emissions by 20% by 2010. As detailed in the TCPA research 20% would be in line with some of the more progressive commitments made by local authorities in England.

We also propose that the policy should indicate that a target would increase over time, as developers become more comfortable with the technology and as the costs continue to fall. The

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<sup>2</sup> Potential for Micro-generation - study and analysis 2005. DTI

<sup>3</sup> Using the 'Merton Rule' – Report of a TCPA survey of local authority planning departments in England. 2006.

<sup>4</sup> [http://www.sustainable-scotland.net/documents/visionary\\_final.pdf](http://www.sustainable-scotland.net/documents/visionary_final.pdf)

<sup>5</sup> <http://themertonrule.org/energy-vs-carbon>

TCPA survey indicates that a number of local authorities in England have already adopted such an approach, with some local authorities proposing progressive targets of up to 30% to be implemented by 2011. Leicester has adopted a policy that increases by 1% each year.

**Micro-Renewables: Criteria for Application.**

WWF suggest that this proposal should apply to all new building developments and all building conversions. We do not see any need to set a minimum area or residential unit number, indeed elsewhere local authorities e.g. Carrick have not set such thresholds for either commercial or residential developments and policies in Chorley and North Somerset propose that all residential buildings are included.

Yours sincerely

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