

Review of SG RD3: Other renewable energy developments

1. Introduction

- 1.1 'SG RD3: Other renewable energy developments' addresses the development of renewable energy resources, with the exception of medium-large scale wind turbines and wind farms, in Aberdeenshire. The purpose of this paper is to examine SG RD3 in light of changes in the national policy and local context. It will consider whether it meets the requirements of Scottish Planning Policy and other national planning documents, and whether it forms a sound basis for making planning decisions on renewable energy developments in Aberdeenshire.

2. Approach

- 2.1 The current policy supports renewable energy development subject to other policies and three criteria. Criterion 1 requires developers to demonstrate that "any new facilities are well related to the source of the primary renewable resources that are needed for operation." This requirement primarily relates to energy from waste and biomass facilities and ensures that they are sustainably sited close to energy sources. It can also apply to hydro-electric schemes. However, there are some types of renewable energy development to which this criterion would obviously not apply, such as solar power.
- 2.2 Criteria require assessment and mitigation of adverse impacts. Criterion 2 protects public health, safety and amenity from any deleterious impacts arising from renewable energy developments. Criterion 3 states that applicants must demonstrate that "satisfactory steps will be taken to mitigate any negative impacts on occupiers of nearby properties (in or outwith a settlement boundary)." Health and safety impacts are also addressed through 'SG LSD9: Hazardous development.'
- 2.3 SG Rural Development 3 then goes on to state that conditions will be applied to planning consents to ensure that the developments will be removed, and sites reinstated, after they cease to operate. This is appropriate as it safeguards Aberdeenshire's landscapes/townscapes from being blighted by defunct renewable energy developments.

3. Background

National context

- 3.1 Scottish Planning Policy (SPP) provides strong support for renewable energy development. Reflecting this stance, the SPP states that "development plans should support all scales of development associated with the generation of energy and heat from renewable sources." The support provided for renewable energy developments in the SPP is reflective of broader government targets for the reduction of greenhouse gas emissions and the production of electricity and heat from renewable sources. The Scottish Government recently published a revised 'Routemap for Renewable Energy for Scotland' which set out a target of 50% of electricity demand being met from renewable sources by 2015, ahead of a target of 100% of electricity demand being met from renewable sources by 2020. The Renewable Heat Action Plan for Scotland also sets out a target of 11% of heat being produced from renewable sources by 2020. Both targets are in place to meet the

ambitious emissions reduction targets detailed in the Climate Change (Scotland) Act 2009.

- 3.2 In terms of the factors that should inform the assessment of planning applications for renewable energy development, SPP states that they “will depend on the scale of the development and its relationship with the surrounding area, but are likely to include impact on the landscape, historic environment, natural heritage and water environment, amenity and communities, and any cumulative impacts that are likely to arise.” SG RD3, in combination with the other relevant LDP policies, addresses most of these issues. However neither SG RD3 nor the other LDP policies make explicit reference to potential cumulative effects. Although cumulative impacts arising from renewable energy developments in Aberdeenshire (with the exception of wind turbines) have not been discernible to date, it may be appropriate to apply the precautionary principle and add a criterion on this issue. This would, for example, safeguard against the potential impact of multiple solar array developments on Aberdeenshire’s landscape.
- 3.3 In addition to wind energy development, SPP provides a particular focus on planning issues pertaining to hydro-electric, biomass and energy-from-waste schemes. Policy on energy-from-waste developments is being addressed in the review of SG Safeguarding 8, so it will not be discussed here. With regards biomass, SPP states that “development plans should identify sites with the potential to accommodate biomass plants which can be supplied from locally available resources and should identify the factors that will be considered when making decisions on planning applications, including amenity, air and water.” The Scottish Government’s planning advice on woody biomass develops this approach by highlighting the importance of heat mapping to the identification of sustainable locations for biomass developments which then form the basis of areas of search and biomass land allocations. Aberdeenshire Council is currently developing a heat map for the area.
- 3.4 The Scottish Government’s planning advice on woody biomass and guidance on ‘Thermal Power Stations’ also advises that areas of search/land allocations should be close to energy sources and areas of heat demand. They should also be in areas off the gas grid where the greatest carbon benefit will be found through the displacement of fossil fuel heating systems.
- 3.4 With regards hydro-electric schemes, the SPP states that “development plans should identify the issues which will be taken into account in decision making on hydro-electric schemes such as impacts on the natural and cultural heritage, water environment, fisheries, aquatic habitats and amenity, and relevant environmental and transport issues.” These issues are addressed in existing supplementary guidance. An additional layer of protection is also provided by SEPA who must provide consent to hydro-schemes before work can take place. In addition to providing detailed criteria for decision making on applications, the Scottish Government’s planning advice on hydro states that planning authorities should “provide guidance on where there are greatest opportunities for hydro developments within the planning authority area and the types of hydro schemes that are most appropriate.” However, due to the limited potential for hydro in Aberdeenshire this seems unnecessary.
- 3.6 The Scottish Government has also published planning advice on large photovoltaic arrays. It identifies industrial sites, in particular, as locations where large photovoltaic arrays can be accommodated, whilst acknowledging

that greenfield sites can also accommodate such developments where landscape and visual impacts can be suitably mitigated. When drafting development plan policies, the advice states that “landscape, urban design, land use, biodiversity, aviation, access, grid, security fencing and decommissioning issues” should be covered. Most of these issues are adequately addressed in relevant LDP policies (though not always explicitly), however both grid connections and aviation are not. With regards grid connections, it is not clear as to why the ability of proposals to connect to the grid is of relevance to the determination of planning applications. Without clarity on this point, it would seem unnecessary to add a criterion to SG RD3 on this issue. The omission of criteria safeguarding aviation from any deleterious impacts from large photovoltaic developments is, however, a potential issue that should be remedied through modifications to SG RD3. In particular, the planning advice states that a 3km exclusion zone should be applied around aerodromes. It should also be noted that, due to the take up of appropriate locations for onshore wind turbines and the falling price of photovoltaic units, large photovoltaic arrays may become increasingly popular among landowners. There have also been a number of enquiries for large photovoltaic arrays in Aberdeenshire to date.

- 3.7 The Scottish Government’s planning advice on deep geothermal highlights the potentially significant role this technology can play in meeting targets for the production of heat from renewable sources. However, a study commissioned by Scottish Enterprise has identified that, although there is some potential for the production of geothermal heat in Aberdeenshire, it is currently unviable. There is therefore no need for specific planning policy, or advice, to be produced on this issue.
- 3.8 NPF2 also supports sustainable development, including “the development of technologies which derive clean energy from fossil fuels; the harnessing of renewable sources of heat; and decentralised energy production, including local heat and power schemes and micro-generation.” SG RD3 supports such technologies by setting out a clear policy on renewable energy developments.
- 3.9 From a legislative perspective, changes to permitted development rights under ‘The Town and Country Planning (General Permitted Development) (Scotland) Amendment Order 2011’ mean that many micro-renewable developments are now not considered by the planning system. This means that SG RD3 will in many cases only apply to non-domestic renewable energy developments, or those within a conservation area or world heritage site. This does not necessitate a change to the policy, however.

Strategic/regional context

- 3.10 One of the objectives of the The Aberdeen City and Shire Structure Plan 2009 (“The Structure Plan”) is:

“To be a city region which takes the lead in reducing the amount of carbon dioxide released into the air, adapts to the effects of climate change and limits the amount of non-renewable resources it uses.”

The Structure Plan sets out a number of targets to achieve this objective, including the production of enough electricity from renewable sources to meet the city region’s demand by 2020. The Proposed Aberdeen City and Shire Strategic Development Plan (“the SDP”) echoes this objective and sets the

same target of producing enough electricity from renewable sources to meet demand by 2020.

- 3.11 The SDP also highlights the need for a diversification of renewable energy development in Aberdeenshire away from onshore wind to other types of renewable technology. In particular, it highlights the "considerable potential in offshore wind, energy from waste, solar and biomass, as well as ground, water and air source heat pumps." This also supports the need for a greater focus on alternative types of renewable energy development in the forthcoming LDP. The renewable heat incentive may also drive a greater use of biomass, solar thermal and ground and air source heat pump technologies.

4. Drivers of change

- 4.1 The above analysis of national and regional policy and guidance has highlighted the need for additional policy on renewable energy developments – specifically on large photovoltaics and biomass. It is difficult to see how a single policy can address the diverse different issues that the different renewable energy generation modes can raise.

- 4.2 In terms of biomass, there is a need to ensure that:

- developments are well related to sustainable fuel sources
- that they produced heat or combined heat and power, rather than electricity
- that they generally supply buildings which are off the gas grid

Areas of search should also be produced based on an analysis of a heat map which is currently being produced.

- 4.3 In terms of large photovoltaics, there is a need for policy criteria to address the potential impact such developments can have on aviation interests. A further criterion should be added which safeguards against any potential cumulative visual impacts arising from large photovoltaic arrays. It has been proposed that the additional policies on biomass and solar power will be incorporated into appendices to SG Rural Development 3.

- 4.4 The analysis of the policy has also suggested that the revision of criteria 2 and 3 is required to remove references to Health and safety, and to maintain both consideration of amenity and the need to mitigate any impacts on nearby dwellings, even if they are insufficient to block the proposal in its entirety

- 4.5 Other policy reviews have supported the need for a new LDP policy on climate change adaptation and mitigation, and this will be a main issue in the LDP Main Issues Report 2013. It may be appropriate for this supplementary guidance to be incorporated into this policy.

- 4.6 The Aberdeenshire heat map could also be used to inform the choice of sustainable locations for residential and employment development close to renewable heat sources. Areas of search could also be published in associated planning advice.

5. Recommendations

- Additional Supplementary guidance on biomass / energy from waste and large photovoltaic arrays may need to be developed

6. Summary of main points

- 6.1 This policy review has highlighted the need for further policy detail specifically addressing biomass and large photovoltaic developments. This takes cognisance of the need to support alternatives to onshore wind, and the specific issues raised by these types of development. It has been proposed that these will form appendices to SG Rural Development 3, though it is likely that SG Rural Development 3 will be incorporated into a new policy on climate change adaptation and mitigation. The LDP's approach to climate change will be a main issue in the forthcoming LDP Main Issues Report 2013.

References

Aberdeen City and Shire Strategic Development Plan Authority (2009) *Aberdeen City and Shire Structure Plan*

Aberdeenshire Council (2012) *Aberdeenshire Local Development Plan 2012*

Scottish Government (2012) Deep geothermal

Scottish Government (2012) Hydro schemes

Scottish Government (2012) Large photovoltaic arrays

Scottish Government (2009) *National Planning Framework for Scotland 2*

Scottish Government (2012) Woody biomass

Scottish Government (2010) *Scottish Planning Policy*

Scottish Government (2011) *2020 Routemap for Renewable Energy in Scotland*

The Town and Country Planning (General Permitted Development) (Scotland) Amendment Order 2011