

## CAIRNGORMS NATIONAL PARK AUTHORITY

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### FOR DECISION

**Title: CNPA Response to Scottish Planning Policy SPP6:  
Renewable Energy Consultation Draft**

(available online at: [www.scotland.gov.uk/Publications/2006/07/10150621/0](http://www.scotland.gov.uk/Publications/2006/07/10150621/0))

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#### **Purpose:**

This paper seeks the Board's endorsement for the Park Authority's response to the above consultation from the Scottish Executive Development Department.

#### **Recommendations:**

That the Board endorse and approve the following points with additions or amendments to be formally sent to the Scottish Executive:

1. The CNPA seeks further clarification in the finalised SPP over how planning authorities should consider the direct and cumulative impacts on National Parks of wind farms outside the National Park Boundary and how the impacts on "wild land" qualities both inside and outside the National Park should be assessed.
2. The CNPA recommends that rather than a requirement for a percentage projected reduction in CO2 emissions via renewable energy production on developments, a range of higher targets for reducing projected carbon emissions for different kinds of projects are set to be achieved through a range of sustainable design, construction and operation measures.

#### **Summary:**

The Scottish Executive is consulting on a draft Scottish Planning Policy (SPP) document on Renewable Energy. This will replace the existing National Planning Policy Guideline (NPPG) on Renewable Energy Developments of 2000. Much of the draft SPP considers the development of spatial policy for onshore

windfarm developments, while other forms of renewable energy, including micro-renewables are also supported. The proposed response to the Scottish Executive seeks clarification over the ways in which the impacts on the National Park of windfarm developments outside the park boundary should be considered by planning authorities, and recommends an alternative approach to reducing the projected CO2 emissions of new development to that proposed in the draft SPP.

**Background:**

1. Scottish Planning Policies (SPPs) provide statements of Scottish Executive policy on nationally important land use and other planning matters. The Scottish Executive is consulting on a draft Scottish Planning Policy (SPP) document on Renewable Energy (available at [www.scotland.gov.uk/Publications/2006/07/10150621/0](http://www.scotland.gov.uk/Publications/2006/07/10150621/0)). This will replace the existing National Planning Policy Guideline 6 (NPPG 6) on Renewable Energy Developments of that was last revised in 2000. Comments are requested by 6 October 2006.
2. This SPP supports the Scottish Ministers' target for generating 40% (now expressed as 6GW) of Scotland's electricity from renewable sources by 2020. In fact, this target may be exceeded as Scotland already had 3.7GW of renewable energy consented in June this year, and the SPP makes clear that Ministers do not see the 6GW target as a cap and that planning authorities should consider it a minimum figure.
3. A key theme of the draft SPP is that renewable energy developments can have environmental, social and economic benefits on a local or national scale and that these should be material considerations in planning decisions. It also highlights the importance of involving local communities in planning for renewable energy and outlines potential for communities to invest in renewable energy developments.
4. Although the SPP considers the full range of potential renewable energy developments that are likely to be dealt with by the planning system, it acknowledges that it is onshore wind energy that is likely to make the greatest contribution to renewable energy generation. To support this, a large part of the SPP provides guidance for planning authorities on locational considerations for wind farms, including reference to topics such as natural and cultural heritage (including designated sites such as National Parks), tourism and recreation, aviation and defence, communities, cumulative impacts, wind resource and electricity grid capacity.
5. Although the draft SPP is not prescriptive about where wind farms will be acceptable, it reinforces the view that internationally and nationally designated sites are less likely to be able to accommodate wind farms without unacceptable impacts. The draft SPP also states that while the potential impact of proposals on areas designated for their landscape value may be a material consideration in planning applications, planning authorities should not add additional zones of protection around such areas.

6. The draft SPP proposes a standard separation distance of 1.5km between the edge of settlements and wind farm developments of over 20 MW that it would define as “large-scale wind farm developments”.
7. There is support for a range of micro-renewable energy schemes that help reduce carbon emissions and provide reliable energy sources, and the draft SPP notes that the Scottish Executive is considering how micro-renewables may be supported in the current review of the permitted development. The draft SPP seeks views on a proposal that planning authorities are required to ensure some types of development provide on-site renewable energy equipment to reduce predicted CO2 emissions by a suggested minimum of 10%.

**Issues affecting the CNPA:**

8. The draft SPP provides a clear picture of the priority Scottish Ministers attach to the production of renewable energy and provides a reasonably clear context for the general approach to renewable energy development adopted by the CNPA to date. However, a number of the proposals within the SPP could be clarified, particularly where they related to the scale of development or the justification for consent.
9. The most significant issue affecting the CNPA and its partner local authorities over the coming years will be in how to assess the direct and cumulative impacts on the National Park of wind farms outside the park boundary. The draft SPP states that broadly, any locations up to the boundary could be acceptable for renewable energy developments. In fact, the CNPA will be providing responses and potentially objecting to a large number of proposals visible from the National Park but both close to and far from its boundary.
10. Allied to this concern over direct and cumulative impacts on the National Park designation, the draft SPP does not provide guidance on how to assess these impacts on “wild land” qualities, that may cross over the National Park boundary but that are important in creating the setting of the National Park within the central and eastern Highlands of Scotland.
11. The support for micro-renewables in the draft SPP reflects the CNPA’s generally positive attitude to such schemes. However, the granting of permitted development status to such forms of development could lead to cumulative impacts that are outwith the control of either the CNPA or local authorities. The CNPA might make a valid case for not including developments that could have a significant local visual or noise impact, such as domestic wind turbines, within the permitted development types in the National Park.

12. The support for community development of renewable energy schemes should be welcomed by the CNPA, although a revision of the interim planning policy on renewable energy to provide a more flexible definition of a community scheme may be required to encourage greater involvement.
13. The proposal for a minimum 10% reduction in CO2 emissions from on-site renewable energy production for some kinds of development is possibly not the most effective method for reducing carbon contributions. Given that energy saving design, construction and efficiency measures can all contribute to the long term reduction in carbon emissions, a more appropriate approach may be to set a higher target to be reached through a wider range of measures that includes the design, construction and operation of the building, of which renewable energy generation may be a part. This is the approach that is likely to be advocated in the CNPA's sustainable design guide and should allow for a more flexible approach to development.

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