
CAIRNGORMS NATIONAL PARK AUTHORITY

FOR INFORMATION

Title: Planning Paper 6: Consultation on the Draft
Highland Renewable Energy Strategy

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Purpose

1. The purpose of this paper is to respond to The Highland Council on the consultation draft of their 'Highland Renewable Energy Strategy'.

Recommendations

2. That the Board note and endorse this consultation response.

Executive Summary

3. The CNPA welcomes and supports the fact that the Highland Council are developing a strategy for the development of renewable energy within the region, but has serious concerns over the complete omission of the Cairngorms National Park (its designation, special qualities and aims) and the CNPA (in terms of its role in planning and other areas, the emerging Local Plan and Park Plan, and Interim Policy on Renewable Energy). The next draft of the Strategy should address the fact that a National Park, and its authority, is partly within the Highland Council area.
4. The CNPA has taken a presumption against intermediate and large-scale* hydro and onshore wind developments within the National Park, but is supportive in principle towards domestic and community-scale* renewable energy proposals. Schemes to implement biomass or bio-crop/fuel developments will be considered on their own merits and impacts. *see Appendix A for a definition of scale.

Background

5. The Scottish Executive, and to a lesser extent the UK government, have set ambitious targets for the renewable energy contribution to Scottish/UK energy production; this is illustrated by the table below. To assess how the Highland area can contribute towards these targets, the Highland Council has developed a draft strategy to determine constraints, capacities and preferred locations for renewable energy developments.

	2010	2020
UK government	10% of UK electricity production	20% of UK electricity production
Scottish Executive	18% of Scottish electricity demand	40% of Scottish electricity demand

6. The Highland Council Draft Renewable Energy Strategy, dated October 2005*, along with its supporting documents has been passed to us for comment; when adopted, this will be used by Highland Council as Supplementary Planning Guidance. This strategy has been prepared by Aquaterra Ltd consultants, based in Orkney. *received by CNPA in late November 2005.
7. The 4 documents can be viewed on-line at:
<http://www.highland.gov.uk/plintra/planpol/planpol.htm>

Consultation Response

8. The CNPA welcomes the fact that the Highland Council are developing a strategy for the development of renewable energy within the region, towards meeting the current targets set by government for energy production. This is a lengthy document (in 4 separate sections) which covers the entire Highland Council area, of which the CNPA is a small section; accordingly, this response will focus on the sections of direct relevance to the Park area.
9. The four documents will be discussed in turn:
 1) Strategy Scoping Report;
 2) Resource Assessment for the Highland Area;
 3) Draft Planning Guidelines; and
 4) Highland Renewable Energy Strategy.
10. **1) Strategy Scoping Report:** the purpose of this is to set out the baseline data from which the SEA (Strategic Environmental Assessment) Environmental Report will be compiled.
11. Section one covers the Key Facts; no mention of the Cairngorms National Park.
12. Section two covers the Plan Context:
 2.1 (relationship to other plans/programmes/objectives) makes no mention of the emerging CNPA Park Plan, Local Plan or Interim Renewable Energy Policy.

- 2.2.1 (environmental baseline data)
2.2.2 (key performance indicators)
2.2.3 (summary of environmental problems); refers to NSA's, environmental and cultural designations, but no mention of the CNP.
13. **2) Renewable Energy Resource Assessment for the Highland Area:** this assesses the potential for: onshore wind, offshore wind, tidal, wave, hydro and biomass. Although the printed (and on-line) maps are very difficult to read, the following are relevant to the CNP.
 14. Table 2.3 Possible planning constraints. No mention of the CNP under 'designated landscapes', visibility or tourism.
 15. Maps in Figures 3.1-3.16 assess onshore wind capacity, 3.16 showing 27 prospective search areas; No.21 being Monadhliath Mountains East, which is either partly in the Park or very close to the boundary. The mapping is poor quality and not sufficiently detailed to assess where this site is relative to, or what the potential impact is on the National Park.
 16. Maps in Figures 3.39-3.44 show potential hydro-scheme locations, some of which appear to be within the CNP but again the mapping is impossible to read and assess accurately.
 17. Tables 4.1 and 4.2 predicts the potential power outputs from onshore wind developments, under varying levels of planning constraint. Table 4.1 has the Park section broken down into: Badenoch West and East, Strathspey south and NorthEast, and Grantown on Spey; Table 4.2 assesses the outputs by sub-region, of which Badenoch and Strathspey is one of eight. As the majority of Badenoch and Strathspey is within the CNP, we would question the rationale behind these figures.
 18. Appendix A details the factors that were applied to each of the resource types (e.g. visibility from Munros, landscape conservation); again, there was no mention of the National Park.
 19. **3) Draft Renewable Energy Planning Guidelines:** This document sets out the general guidelines to be followed when assessing any renewable energy proposals.
 20. 1.2 This section should include the CNP Park Plan (1.2.1.1), the CNP Local Plan (1.2.1 and 1.2.1.2) and the CNP Interim Policy on Renewable Energy (1.2.1.3).
 21. 3. Gaining Planning Approval: 3rd para. should include applications requiring planning permission may be dealt with by the CNPA within the Park boundary.
 22. 3.1.1.1 Pre-scoping and initial consultation: This should include the CNPA for proposals within, or close to, the Park boundary; also for schemes that could be visible from within the National Park.
 23. 3.1.1.6, 3.1.1.8, 3.2.3 and 3.2.4 should also include the CNPA.

24. **4) Highland Renewable Energy Strategy.**
25. This is a 74 page document setting-out the detailed vision and strategy for renewable energy across the entire Highland Council area; specific sections are highlighted below as regards their relevance to the CNPA.
26. 1.5 The planning process: No mention of the CNP or CNPA.
27. 5.1 The CNP Park Plan and Local Plan, as well as the Interim Policy on Renewable Energy, should be added to the list of strategies.
28. Figure 5.3.1: this map should delineate the CNP, as it straddles at least 3 of the sub-regional areas.
29. Table 5.4.2: reference should be made to CNPA planning powers.
30. Figure 6.2.1: This map of planning constraints on prospective hydro schemes suggests that constraints on the tributaries of the (Natura designated) River Spey are less than those of the main river, which is not the case.
31. Figure 6.2.2: Map showing potential forestry areas; this requires detailed consultation with the CNPA (particularly the Land Management and Natural Heritage groups).
32. Figure 6.2.3: Map showing bio-crop areas (as 6.2.2).
33. Figures 6.2.4 – 6.2.8: maps showing potential and preferred development areas for onshore wind. These obviously require detailed consultation with the CNPA. Figure 6.2.4 shows the Monadhliath North East area with 99km² preferred development area producing 764 MW of renewable power.
34. Table 8.2.1: List of conservation designations and associated development constraints. Under 'National' this does refer to National Parks, but there is still no specific recognition of the CNP.
35. 8.2.4 Landscape: as 8.2.1 above.
36. 8.2.4 T1: "It is the Council's aim to avoid intrusive development of windfarms into designated landscape areas". If this policy was to include the CNP, then the policy does not accord with Figures 6.2.4 – 6.2.8 or any other map showing potential locations/capacities.
37. 10. 2 Key Stakeholders: CNPA?

General Issues:

38. Generally, all references to the Highland Council should also make reference to the CNPA, as they become the 'planning authority' for a proposal who's application is 'called-in' by the CNPA. The CNPA will also be consulted by the Scottish Executive on all large/national applications around its boundary.

Summary

39. The CNPA welcomes and supports the fact that the Highland Council are developing a strategy for the development of renewable energy within the region; this is essential when so much of the area is comprised of highly valued landscapes and natural heritage designations, all of which are a major economic draw for tourists and recreation. We do, however, have serious concerns over the complete omission from the strategy of the Cairngorms National Park (its designation, special qualities and aims) and the CNPA (in terms of its role in planning and other areas, the emerging Local Plan and Park Plan, and Interim Policy on Renewable Energy). The next draft of the Strategy should address the fact that a National Park, and its authority, is partly within the Highland Council area.
40. The CNPA acknowledges that the development of renewable energy does accord with the aims of the Park, particularly the second and fourth aims, but recognises the considerable impacts that large energy developments can make on the landscape and natural heritage of the Park. The CNPA has taken a presumption against intermediate and large-scale* hydro and onshore wind developments within the National Park, but is supportive in principle towards domestic and community-scale* renewable energy proposals. Schemes to implement biomass or bio-crop/fuel developments will be considered on their own merits and impacts. *see Appendix A for a definition of scale.

Appendix A : Classification of projects within the new proposed national planning framework.

White Paper planning classification		Minor	Local	Major	National
Renewables category		Domestic	Community	Intermediate	Large
Permissions		Routine approval if installed to specification	Determined by council officials with right of appeal to elected members	Determined by elected members with right of appeal to Scottish Executive	Determined by Scottish Executive, after consultation with local authority
Indicative installed capacity	Hydro	<10KW	10-100KW	100KW-1MW	>1MW
	Bio-energy	<10KW	10WM-5MW	5-100MW	>100MW
	Solar				
	Thermal				
	Onshore wind				
	Waste				
	Coastal wave				
	Tidal head Secondary structures				