

**Scottish Renewables Briefing
Onshore Wind Network Energy Strategy Meeting Outputs**

**Introduction**

These notes are a summary of feedback received at Scottish Renewables Onshore Wind Network meeting of 14th March 2017 on the Scottish Government’s draft Onshore Wind Policy Statement and Energy Strategy.

The feedback will inform Scottish Renewables consultation response to the two documents.

A full list of all comments received on the day can be found in Annex A.

**Route to Market**

**Do you agree with the three areas of activity identified?**

* **Efficiency as a material consideration**

Members stated a clear definition of ‘efficiency’ was required, and that definition should be positively framed. Suggested definitions and measurements included:

* productivity/power at lowest cost
* most economically viable
* most efficient design
* contribution to targets
* capacity factors
* socio-economic benefit
* maximisation of yield

Consistency in assessment was stressed as important, but challenges in comparing projects were also highlighted. Members warned the consideration could create further competition between sites, or create further ‘alternatives’ against which developments are assessed. The way in which it is weighed and assessed in planning will be critical to its success.

It is critical that the decision makers are competent to make these assessments. The ability to communicate ‘efficiency’, and why it is important, to a planning committee or planning officer was felt to be challenging. Members believe clear, national level guidance is required to deliver this and ensure local planning authorities don’t individually determine what is, and isn’t, efficient. There were questions over whether SPP in its current form was strong enough to achieve this.

Members were therefore disappointed the current proposal doesn’t explicitly address issues surrounding increased tip heights. More positive guidance on the deliverability of (fewer) large scale turbines was proposed, given that the majority of new applications will be for larger turbines. Members recognised that if there is a bigger impact, bigger benefits must be demonstrated.

Consistency in application to s36 and non s36 developments was highlighted as important, while a number of wider challenges were also raised, including grid constraints, distortion of the supply chain and confidentiality restrictions driven by a competitive auction process.

* **Facilitating cost reductions**

Grid, planning, community benefits and business rates were highlighted as key areas where the Scottish Government could facilitate cost reductions and offer tapered relief.

In particular, increases in planning fees were highlighted as a challenge, especially for smaller developments. Members were concerned the planning review could also result in substantial change, and any increases in development costs from risk and uncertainty would impact CfD bids. SNH and local authority approaches to increased tip heights were raised as another significant challenge in this area.

In relation to grid, members suggested a more coordinated approach to connections could be facilitated, while a bigger roll out of intelligent management systems and more support for storage technologies could reduce the cost of connecting.

Support for the supply chain, innovation, and supporting infrastructure (eg roads) were also highlighted as areas where the Scottish Government could support further cost reductions.

Members warned the Scottish Government’s localism agenda could increase costs by introducing more complex development processes with increased risks of delay in project timelines. Community benefit requirements were also felt to be becoming unrealistic.

**Encouraging Innovation**

The Scottish Government’s proposal to explore the scope for increased PPA provision within the national collaborative contract was welcomed as a good signal, but the actual impact of this was felt to be limited.

Caution was urged around the messaging of corporate PPAs as a whole due to the uniqueness of each agreement. The scale of this market was deemed to be limited, and issues in relation to the bankability of end users were raised.

**How can Scottish Government further facilitate a route to market?**

A variety of ideas were put forward particularly around the promotion of storage. The provision of a market stabilisation contract, and a Scottish CfD were also proposed.

It was also suggested the Scottish Government should promote the renewables industry through the context of the industrial strategy and through community action plans.

**Repowering**

**Do you agree with the proposed approach?**

Members generally agreed with the proposed approach, but felt more support was needed in a variety of areas. It was stated the Scottish Government will not meet a number of its targets without making repowering easier.

Members also highlighted that the process of repowering on the first sites was absolutely critical, as it would likely set precedents for future sites.

While repowering is important, it was stressed that we cannot lose sight of new sites, as repowering alone will not deliver the required step change in capacity and the industry must take the opportunity to maximise the capacity of all sites.

**Are there further means to facilitate repowering proposals?**

It was felt that the planning process for repowered sites needs to be streamlined and a presumption in favour of re-development/re-use should be contained in planning policy.

Significant concerns were raised in this context over the direction of travel of SNH policy and their upcoming guidance on repowering. Members stressed the Scottish Government needs to provide strong direction to SNH and other agencies to ensure their work supports the aspirations and requirements of the Energy Strategy.

In particular the baseline for repowering projects was highlighted, with members stating the baseline for any assessment should be the site containing the existing development and the strategy should be explicit about this. It was proposed that only the additional impact of new use should be assessed, and data from the existing development should be used to provide increasingly robust assessments. Clarity around how cumulative impacts assessments should be undertaken was requested.

Questions were raised around impacts on the grid, including how grid companies could plan more strategically for repowering, how the efficiency of the system could be maximised, and whether there were opportunities to deliver better queue management.

Members were also keen to promote the benefits of repowering - the industrial and supply chain benefits, as well as the ongoing community benefits. The wider role of communities in repowered projects was highlighted, and the need to open up discussion of shared ownership to repowered projects. It was also suggested that different types of investors could be attracted to onshore wind projects if the development was seen to be ‘in perpetuity’.

Again, members stated that there needs to be a consistency in approach between s36 and non s36 projects.

**Voluntary Coordinated Approach v Business as Usual**

**Do you agree with the proposal to pursue a ‘locally co-ordinated approach’ or business as usual?**

In general, members felt that the ‘business as usual’ approach worked well and that the ‘locally coordinated’ approach presented a number of significant challenges.

Members also generally agreed that the spatial approach should not be pursued, but suggested there may be merit in exploring regional decarbonisation targets.

**Why?**

While one response suggested we should consider following a TAN8 style approach, most feedback stated that a spatial approach was unnecessary and overly complicated. Strategic assessments were felt to be unable to capture all the sensitivities of sites, and therefore while potentially suitable for identifying ‘areas of search’, they were not suitable for any more detailed site identification process.

In relation to regional targets, it was suggested that decarbonisation targets could be considered rather than specific onshore wind targets. This would include heat and transport efforts. Such an approach is used in the Netherlands where the national target is delegated to regions. Industry could then promote their projects as a way for the local authority to meet its decarbonisation target.

Members voiced significant concerns over the ability to implement a locally coordinated approach. This was driven primarily by issues around commercial confidentiality, particularly within the current competitive funding environment and delivery schedules.

It was felt coordination of projects at the pre-planning stage would not be possible, but there may be potential for coordination on some issues post-consent. Some suggested areas that could benefit from a more coordinated approach included O&M costs, forestry, transport, grid, aviation, community benefit/shared ownership and radar. However, members stated if projects can’t coordinate they shouldn’t be penalised.

In relation to ‘business as usual’, members were keen to stress that developers already coordinate in some areas and that ‘business as usual’ does not mean doing nothing. In general, it was felt that the current approach worked reasonably well although there were areas where improvements could be made. In particular, more positive support for development was felt to be required which would provide more certainty to developers.

**Barriers to Deployment**

**Do you agree with the proposals regarding Eskdalemuir?**

Members broadly agreed with the proposals, however, they requested further clarification on the reasons for the proposed extension.

**Do you agree with the proposal to facilitate a strategic approach to radar issues?**

Members broadly agreed that a strategic approach was required, but questioned how it would work in practice. For example, can developers be forced to ‘share’ mitigation solutions, or can NATS be required to purchase mitigation technology and make it available to developers?

Members felt that the industry should take the lead in finding a solution, but Scottish Government involvement was important as an ‘honest broker’ between government department and agencies, as MoD and NATS were challenging to deal with directly.

Several problems with the existing system were highlighted, including SNH/CAA approach to lighting and a lack of information sharing between parties.

**Do you have any comments on the Peatland Policy Statement and Carbon Calculator?**

In general, members didn’t feel that the carbon calculator or peat map added significant value to the consenting process. The carbon intensity of the whole system was suggested as a more meaningful metric.

It was suggested bigger issues existed around peat disposal or positive use of peat. Members proposed that a working group be established to examine this use and develop industry best practice.

**Are there other barriers to deployment to highlight?**

Areas where members felt there were significant barriers to deployment included:

* Aviation lighting requirements
* Grid charging
* Wild land
* Landscape capacity assessments

**Community Benefit**

**Are the Good Practice Guidelines for Community Benefit Successful?**

In general, members felt the Good Practice Guidelines had been largely successful and had created a level playing field.

However, questions were raised as to how ‘success’ should be defined in this context. Member experience is that community benefits could both unite communities and cause friction. In some instances the communities’ view of a development was not impacted by the presence of community benefit funds and members stressed it is important to connect with communities in ways beyond the £5k/MW.

‘Success’ was deemed to depend heavily on how the community is organised and more comment on this is provided below.

Member’s also stressed that community benefit packages now have more of an impact on the viability of a development given the reduction in revenues they are now facing. Some suggested community benefit was a luxury that they could afford under the RO, but that government expectations around the continuation of funds are too high.

**Are Community Benefit packages being delivered in practice?**

Member feedback was that community benefit packages were mainly being delivered, but they did highlight some examples of bad practice.

These examples focused on successor owners not honouring obligations, and instances of non-payment from private rather than commercial developments. It was noted that older sites tend to cause more frustration within communities compared to more recent developments.

The greater concern was around whether the packages were being properly utilised once delivered. When moneys aren’t spent it was felt to reflect badly on developers. It was acknowledged that it can be a significant volume of work for the community to be involved in a successful scheme, and again, success is heavily depend on the organisation and capabilities within a community. The pre-existence of a community council and community action plan was felt to be beneficial, but members felt that other local groups should be encouraged and empowered to become active in the process.

It was also highlighted that funds are also often highly restricted in the way they are able to be spent. For example, community benefit funds are sometimes prohibited from being used as investment capital in shared ownership schemes.

**Proposals for Change**

Members stressed that future community benefit packages must consider the viability of the project in light of changes to revenues and other policy requirements, including shared ownership. They suggested the £5k/MW value could be delivered in a variety of ways and a package of support should be considered, which accepts other forms of enhancement as community benefit.

It was suggested these forms of enhancement need not be monetary. For example, the use of local suppliers was felt to be more beneficial than direct payments, therefore community benefit payments could be weighed against local supplier input. In order to ensure schemes remain viable, the rate of community benefit payment could be linked to the productivity of the site, or represented as a % rather than flat £/MW.

Other suggestions included:

* making community benefits part of the economic benefits which are material considerations in the planning process
* introducing a business rates rebate for community benefit payments
* introducing a ‘top up’ to a CfD for a scheme paying community benefits
* offering reduced bills as part of a community benefit package
* flexibility in payments to reflect community needs

Members also suggested further community engagement and education on community benefits and the Scottish Government’s Energy Strategy was required.

**Shared Ownership**

**How can the Scottish Government improve the prospects of further shared ownership?**

Members felt that the requirements relating to both shared ownership and community benefit should apply to generators of all types of energy, not just renewables and onshore wind.

Where projects are unable to deliver shared ownership, they stressed this must not act against them in the consenting process. However, how it will be treated in planning was not felt to be clear. Recent examples were given where a reporter had considered agreed heads of terms added weight to the application, in contrast with another where a share offer did not. Questions were therefore raised as to the weight that differing forms of agreements will carry.

Members stressed flexibility was key.

The links between shared ownership and community benefit were highlighted, with members suggesting discussions around community benefit should be widened to consider offers of ownership to the value of £5k/MW, or conversely if shared ownership is offered, community benefit payments should be adjust accordingly.

Given the confusion as to how shared ownership will be treated in the consenting process, it was felt guidance from Scottish Government was needed. Concerns were raised as to the role of Local Energy Scotland in the process, and their ability to provide commercial advice to communities.

In terms of how the prospects of further shared ownership can be improved, members suggested Scottish Government and it agencies could act as a pathfinder, purchasing a share and then sell it onto a community, or facilitate lending to the communities by acting as a guarantor. Reduction in the rate of REIF funding or the provision of an Enterprise Finance Guarantee were also proposed.

**AOB**

Members were keen to understand more about how the strategy will be rolled out and communicated to the wider public. Questions around its links to UK Government policy and how it will be used at a local level were also raised, particularly in relation to planning.

A particular concern was around the 11 – 17GW required deployment estimate. It was deemed to be too vague and further information was sought as to exactly what was accounted for within this range. Given the 2020 Routemap proposed 16GW by 2020, 17GW by 2030 was not seen as aspirational. It was felt the strategy could promote the industry, and onshore wind in particular, more than it currently does.

Concern was raised around the challenge to deliver the first onshore wind farm without subsidy. Members didn’t feel this would be appropriate for all developments going forward. It was suggested more information was needed relating to subsidies and cost comparisons between technologies, stressing the cost effectiveness of solar and wind energy. Concerns around the removal of FiTs were raised, particularly in the context of the Scottish Government’s drive for increased community scale projects.

The reliance of CCS in the TIMES model was raised as an issue given it’s currently not a commercially viable technology. And the challenges around heat and the potential to link decarbonisation of heat and onshore wind development were also raised.

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**Annex A**

**Unedited Feedback**

**Onshore Wind Network Meeting - Unedited Notes**

**Efficiency as a material consideration**

* what is actually efficient?
* how do we define efficiency?
* where in process is it used?
* definition of efficiency?
	+ productivity/power at lowest cost/most economically viable?
	+ contribution to targets?
	+ most efficient design?
* measure of efficiency?
	+ capacity factors
	+ MW hours/turbine
	+ socio/sustainable economic benefit
* cost/power yield
* market needs to dictate efficiency
* need to positively frame efficiency
* efficiency not necessarily the right measure
* maximising yield is key
* economic viability is key
* technical efficiency too narrow?
* efficiency for site rather than general?
* capacity factor a good measure
* need for clarity on what material evidence is needed to support ‘most efficient’
* material consideration – need to have consistency across 32 local authorities and SG
* needs to be thresholds for consistency
* consistency
* needs to be a level playing field
* how does it compete against other material considerations?
* how weighting will be considered against other material considerations
* weighting is very important
* how is it weighed in planning?
* to deliver 10GW we need a range of sites, can’t all be really good – weighting needs to consider good and can’t compete with each other too
* difficult to make comparisons, ie 150m of what is a 125m layout
* protect against ‘alternatives’ argument against site
* could work against proposals
* difficult to get over a planning committee or with planning officer
* decision maker competency
* efficiency – shouldn’t be up to LPAs to determine what is efficient and what isn’t
* risk of LPAs taking own view
* could risk LPAs setting benchmarks
* LPAs will need some help in understanding efficiency
* consenting process should only deal with increased effects weighed against increased energy yield
* national energy policy needs to be give weight
* SPP not strong enough
* deliverability needs to be part of planning consideration
* education on why efficiency is important
* does not address tip height caps in capacity studies
* more positive guidance on where large scale turbines will be permitted and where infrastructure can be delivered
* all applications will be for big turbines (no small turbines available) - have to change mind-set
* landscape impact of fewer turbines
* bigger impacts must demonstrate bigger benefits
* huge gap between s36 and planning – SG must close this gap through planning consultation
* not just to s36 also apply to local
* counter intuitive for planning system
* grid constraints
* danger of being prescriptive
* efficiency issues
	+ distort supply chain
	+ need to tie targets to efficiency metrics
* need to consider impact in competitive auction process
* grid needs
* needs to allow for other technologies to boost efficiency
* who is the end user?
* case studies for SG
* material consideration is needed to get projects over the line. Perhaps comparator is what is ok vs what you want to do

**Facilitating Cost Reductions**

* no clear actions in document on back of Everoze report
* grid
* coordinated approach on connections
* use storage to manage flows
* DNOs abusing monopolies
* national infrastructure plan – plug and play
* grid – bigger roll out of intelligent management systems to reduce cost of connecting
* front loading of costs
* REIF funding is @ 8% could that be lower? some countries at 3%
* SG to deliver shared ownership
* community benefit – need to have feasibility as to how that is delivered
* community benefits could make a project unviable – needs to be linked to viability
* planning fees x 6 – takes small schemes out
* streamline planning
* planning – fees, structure
* planning fees up but no clarity on improvements for service
* risks of getting things wrong in the planning review
* review could create substantial change but could impact access to CfD
* proportionate and timely responses needed from SEPA and SNH
* better checks and balances
* upfront costs need to be recovered for unsuccessful projects – high cost planning risks pushing up CfD bids
* support supply chain
* weighting system to local content
* innovation – turbine bases
* industry representative on infrastructure planning fora
* transport routes
* road improvements
* developer contributions
* localism agenda could add costs through time delays
* sharing info difficult but gov can share
* aviation – particularly for larger turbines, general consensus on lighting

**Innovation**

* PPA – good signal but likely limited effect
	+ good idea but limited control for SG so how would it work?
	+ messaging around corporate PPA projects needs to be right – they are reasonably unique
	+ will be first come, first served, so new projects may not have a change to compete for PPA
	+ will be limited fund
	+ exemptions for agencies
	+ more clarity on how public agencies can do it
	+ Does it relate to cities?
	+ how would it be coordinated?
	+ is it part of the SG energy company?
	+ end users are not necessarily bankable
	+ need to factor in use of system costs
* third party view
* route to market
	+ classification of storage as generation is an issue for costs
	+ focus on market stabilisation contract
	+ stronger, lower cost supply chain domestically?
	+ better to go large-scale storage than Norway connector
	+ a Scottish CfD
	+ tax breaks
* lobby for renewables industry in Scotland in context of industrial strategy
* need to tie in with community action plans etc
* use onshore wind to deliver these plans – cut through anti-sentiment

**Other Cost Reduction Issues to Consider**

* shared ownership – standardised approach to make this easier for communities to adopt
* community ownership/benefits will be delivered by giving a share of big projects
* £5k/MW community benefit unrealistic
* community benefit
* rethink rates – need some form of long term consistency
* business rates too high
* business rates discount
* innovation – use more storage to manage grid
* energy storage market stabilisation
* ability to plan for cost
* supply chain plans
* continued lobbying on pot 1 auctions
* carbon taxation – revenue neutral carbon tax
* incentivise business, industrial sites through taxation
* tapered relief
	+ planning fees
	+ business rates
	+ community benefit
* small scale wind is dead
* planning costs
* SNH guidance on designing windfarms in landscape
	+ height v conservative
	+ nothing about 100m
	+ needs amending

**Repowering**

**Do you agree with the proposed approach?**

* repowering meaning?
* agree in part with the approach but not clear on consenting and planning
* Don’t agree with proposed approach – more support needed
* Agree with proposed approach but:
	+ need to bring SNH along
	+ shouldn’t require the same assessments as a new site
	+ further clarification on ‘established’ land use
* just let us get on with it
* how repowering is facilitated on the early repowers will be key to setting precedent. Therefore needs to be done well
* danger of excluding new sites indirectly
* repowering is not going to create step change in capacity – new sites are still key
* don’t lose sight of new projects
* industry needs to take opportunity to max capacity of sites
* will not reach targets without making repowering easier – there are not huge cost savings available

**Are there further means to facilitate repowering proposals?**

* needs measured in planning
* repowering policy must be in planning policy
* planning process needs to be streamlined
* presumption in favour of something of same scale and that becomes baseline – part of existing infrastructure
* presumption for re-use
* presume that site is reset – so no development
* presumption in favour of redevelopment
* need a presumption in favour
* very concerned about SNH approach and forthcoming guidance
* Scottish Government document is good, but SNH’s own work doesn’t match
* LVIA should not be a leading consideration in planning
* SNH obsessed
* SG must be strong and control their agencies and other anti stakeholders
* will SG review SNH draft before it is issued?
* SNH must be brought under control
* need to coordinate SNH
* SNH is going in opposite direction
* wild land guidance is seriously flawed and poses major problem
* artificial s36/planning distinction
* open up time limited consents – can there be a way to expand assuming plant working?
* sui generis class of development ‘generating station’
* add work ‘key’ material consideration
* need for grid companies to get more strategic to plan for repowering
* grid – opportunity to max efficiency of the system
* grid consents to be better regulated, better queue management?
* s36c projects should gain similar policy weight as repowering projects
* consistency of approach – s42/new applications
* greenfield consent as baseline is not right
* baseline point is not in document clearly enough
* need to justify your project as part of the baseline
* prov. baseline is existing windfarm
* must use existing development as baseline
* additional impact of new use – ie repowered site over existing
* repower EIAs should give useful data eg birds and data will be a fact rather than prediction
* starting again from scratch is not cost effective
* need to look at sites around repowered sites both in terms of how they look now and how they will develop once repowered
* strategic assessment for existing sites
* TAN 8 version 2
* need to consider strategic repowering should still be streamlined
* repowering/new project – who has priority in terms of cumulative impact – needs clarity
* guidance outlining benefits but not too prescriptive
* co-location and repowering, what are the opportunities?
* developers/landowners what they could develop and coordinate grid capacity to match
* coordination of forestry commissioner
* landowners will have a position of power – harness that for community engagement, use LES
* community input before repowering – opportunity for shared ownership
* highlight that end of life stops community benefit, so impact is not just environment
* need to open the discussion on community benefit further – what can be offered – cheaper electricity? local PPAs? Shared ownership? put in a battery
* you need a route to market
* material benefits of wind not recognised in planning system – refocus discussion
* use repowering to reinforce supply chain/industrial strategy case
* be clear that repowering is not like for like but baseline economic argument is stronger
* encourage different type of investor if ‘in perpetuity’ development

**Voluntary Coordinated Approach v Business as Usual**

* **option 1:**
* unnecessary and too complicated
* Spatial approach can cause land grab
* risks around other factors of sensitive land
* Spatial approach can give local authorities authority to refuse developments outside spatial area
* We need TAN 8 version 2
* Could lead to more PLIs and challenges
* need flexibility
* more scrutiny of capacity studies needed
* NATS needs to be more controlled/held to account
* spatial approach should not be discounted as can give areas of search, however, no guarantee that strategic areas are suitable
* We can better coordinate on:
	+ forestry
	+ transport
	+ grid
	+ aviation
	+ radar
* **option 2:**
* decarbonisation targets?
	+ decarbonisation target per local authority (not as specific as a share of wind)
	+ could include heat networks and transport
	+ penalty could be a carbon tax
	+ Netherlands has a national target delegated to regional targets for decarbonisation
	+ Penalty – region can step into deliver instead of local council
	+ industry could do more about selling their projects as they way for LAs to meet their decarbonisation targets
* **option 3:**
* commercial confidentiality works against this
* There are some real challenges in getting developers to share info in competitive environment
	+ non-starter
	+ simplistic
	+ conflict of interest
	+ just wouldn’t work
	+ too much self interest
	+ confidentiality agreements
	+ protection of data
	+ timescales/milestones – different stages
	+ issues with timescales/schedules
	+ cumulative planning and market best set up to deal with issues
	+ another TAN 8 hangover – doesn’t work
	+ if it’s not broke, don’t fix it
	+ issues being competitive in auctions
	+ who carries financial risk of a partner project failure or being delayed?
	+ industry needs to move in this direction (strategic) like it or not
	+ There are benefits to be gained:
		- coordinating batteries
		- O&M costs
		- sharing spares
	+ could work where consents are in place but not at planning
	+ incentivise developers to collaborate and coordinate but not penalise if they can’t
	+ grid could improve their approach to not discussing any other projects in an area?
	+ joint design and access statement, shared document given positive consideration in determination
	+ FCS tender model?
	+ radar
	+ cumulative noise
	+ should be strategic for all renewables
* **option 4:**
* works ok subject to more positive support
* too much focus on commercial developer, needs greater coordination of other parties
* need regional policies supported by national (and maybe industrial strategy)
* Business as usual
	+ has worked reasonably well
	+ should be open to improvements
	+ responsible developers will consider shared infrastructure/co-locating technologies anyway
	+ need to emphasise that developers already collaborate
	+ BAU is not do nothing
	+ could be improvements to BAU
	+ developers could work more on practical things (transport, planning gain)
	+ pooled approach to community benefit/shared ownership
	+ wouldn’t work because larger turbines and repowering need to happen
* pipeline of consented sites is much smaller than SG thinks if apply deliverability criteria
* success rate of planning consent is not high enough
* system needs to give more certainty eg housing development – higher rate, almost certain
* needs to be government lead not LPAs
* tied into the industrial strategy
* need to work across trade associations, CBI, local chambers, FSB
* loudest voices in community don’t represent the community
* UK Gov could encourage Scotland to deliver big against targets

**Barriers to Deployment**

**Do you agree with the proposals regarding Eskdalemuir?**

* Broadly agree
* some projects disadvantaged but others benefit from release beyond limit
* No big issue
* good outcome subject to more clarity about how much can be done within the 50km zone
* if this is the end of it, fair enough
* basically ok with the 15km zone
* more than doubles the capacity that is constrained
* taken 10 years to negotiate the 10km – why is it changing?
* need to get clarification on reasoning of extension
* more openness needed
* opportunities for mitigation

**Do you agree with the proposal to facilitate a strategic approach to radar issues?**

* welcome strategic approach
* strategic approach is required
* Strategic approach needed – lines of communication needs to be open
* could help but how would it work?
* not a planning but policy issue
* monopoly situations prompt government intervention
* SG find resource to deal with radar issues
* needs to be industry lead
* developers to come together to create a solution for aviation issues
* SG as honest broker between government departments and agencies is a good thing
* facilitating discussions of NATS
* MOD are too difficult to deal with
* Need access to MoD and air traffic to open the discussion
* aviation sector has to play a part in the solution
* civil is easier to deal with – becoming ‘here’s the price’
* German model – if radar issue it’s the radar owners problem to resolve
* NATS cant continue to ask for funds after asset is paid for
* CIA need to decide what is happening with lighting
* arbitrary 5km patch limit
* licensed and unlicensed
* Not enough information made available
* incorrect assumption that there are solutions above 150m tip heights
* SNH adverse to any lighting on turbines
* unreasonable position on turbines. if radar can see then unacceptable regardless of distance of whether on flight path to airfield
* can original developer be ‘forced’ to share?
* should NATS have to buy radar solutions making it open to other developers
* developers shouldn’t have veto over use of their mitigation solutions
* government insurance wrap or pay and recover

**Do you have any comments on the Peatland Policy Statement and Carbon Calculator?**

* carbon intensity of whole energy system rather than just grid
* climate change should be reference point for acceptability not whether on peat or not
* map is a waste of time
* carbon calculator – not convinced it carries weight in consenting process, it’s just something you have to do
* need ability to have a high resolution view, perhaps developer has to bear the cost
* there are positive things that can be done to peat
* issue is how to dispose of cut peat
* Need review on what is the most logical thing to do with peat
* working group required to look at industry best practice

**Are there other barriers to deployment to highlight?**

* aviation lighting requirements, alternative options?
* lighting – agencies need to work together to approve and adopt solutions
* lighting – civil and military aviation, no incentive to do anything therefore slow
* Grid – not so much competition therefore may allow for more collaborative approach between developers
* grid charging – need to redesign
* national grid costs paid through taxes (not TNUoS charging to generators) eg the Netherlands
* TNUoS charging needs to reflect where renewables projects will be (away from centres of population)
* extend permitted development rights to contestable works to equalise competitive advantage of TNUoS/DNO and encourage collaboration
* Scottish woodland policy and compensatory planting
* Wild land
	+ should be less restrictive and seen less of a designation
	+ worsened through vagueness
	+ it’s a mess
	+ policy is rubbish
	+ draft guidance is very poor
	+ is unclear and new guidance makes it even less clear
* limited areas of search
* landscape capacity studies restrictive on turbine heights
* Landscape assessment
	+ magnitude of effect/change vs sensitivity better than assumption any visibility is adverse
* LRBs
* draft policies still given significant weight
* curtailment
* getting access to land

**Community Benefit**

**Are the Good Practice Guidelines for Community Benefit Successful?**

In general, members felt the Good Practice Guidelines had been largely successful by creating a level playing field.

* Good practice guidelines have been successful by creating a level playing field, but they may create expectations of more
* How do you define success?
* Doesn’t change the communities view of a development
* Can cause friction within communities but can also unite communities
* How to connect with communities beyond the £5k/MW
* Success depends on how the community is organised
* Community Benefit now having more impact on a development than it used to do given reduced revenue, question how sustainable CB now is
* CB a luxury under the RO?
* Are government expectations too high?

**Are Community Benefit packages being delivered in practice?**

* bad examples of successor owners not honouring obligations (since not legally binging)
* Some cases of non-payment from private developments rather than commercial developers
* Mixed experiences of success
* Largely successful, and mainly delivered in practice
* Use of local suppliers is more beneficial
* community benefit funds are sometimes prohibited from investing in community ownership
* Packages are being delivered but question whether they are being properly utilised?
* Difficulties arise over how money is spent. Can be restricted or restrictive.
* When money isn’t spent it reflects badly on developers
* Split payments to different projects to reflect communities’ needs
* Older sites cause more frustration
* Lots of work involved in getting a successful scheme
* Pre-existence of a community council helps
* must identify local groups and community action plans to act as drivers, which can counter negative community voices

**Proposals for Change**

* £5k/MW can be delivered in many different ways
* Making community benefit part of the economic benefits which are material considerations for planning will improve the engagement process
* Link rate of CB to productivity of the site or weight CB against local supplier input
* Other forms of enhancement could be treated as community benefit
* Creative solutions to make community benefit more viable – business rates rebate/reduced bills/top up to a CfD
* Could be a % rather than £/MW
* Should consider a package of support
* Contribution must be viable
* Doesn’t have to be monetary
* Communities need to be educated re the energy strategy
* Community best practice road show? bring developers to talk through CB?
* CB continues to be focused on community councils, but there are other groups that should be encouraged to engage

**Shared Ownership**

**How can Scottish Government improve the prospects of further shared ownership development?**

* what measures in place by government to ensure 50% of consents have SO?
* SO/CB should apply to all energy
* Community benefit should be payable by all generators
* reporter added weight to head of terms in recent PLI, no weight however to a share offer. Therefore how it will be consider in planning is not clear.
* weight can be given to making an offer - not a concluded deal
* need to avoid lack of SO being an issue for consenting
* potential for linking higher tipi heights to shared ownership discussions and greater efficiency
* ongoing role of developer can cause tensions with new owners of windfarm assets who don’t want ongoing role
* why does ownership have weight in planning but CB doesn’t?
* if SO offered adjust CB accordingly
* Need to open discussion on CB to options of ownership to the value of £5k/MW
* SO depends on a route to market
* Need to bring communities in right at the start
* government need to push forward on LES guidance
* SG could carry out analysis of issues that have arisen and try to overcome them
* LES are one-dimensional meeting organisers. Help with form filling but not much commercial advice
* SG and agencies should go in first then ‘sell’ it on to a community: this idea exists but put it into action
* SO government set up a p.c.g. for local community lending?
* Standardised approach would help SG standing behind/acting as guarantor or pathfinder
* Catch 22 because can’t fund during development stage/too risky
* flexibility rather than a fixed offer
* is it really a big issue?
* Treat community as any other investor
* Need to share risk
* not keen on equity more a share?
* industry innovation will show good examples to counteract bad
* tap into community plan
* What is the community?
* Reduce rate of REIF funding
* Enterprise Finance Guarantee
* Incentives mustn’t encourage people to go against the GPP.

**AOB**

* energy strategy should be evolving
* think about roll out of the strategy – how does everyone get message?
* cost to consumer should be focus
* needs Westminster holistic plan on energy – role of devolved administrations
* how does it integrate into GB strategy and how is it used at a local level?
* wording not clear on 11 – 17GW total? Additional?
* clarity of the 11 – 17GW range
* 2020 route map – 16GW by 2020, 2030 strategy 11 – 17GW
* go for 17GW target, range 11 – 17 too broad and too woolly. onshore wind will have a big role to play in delivering this
* flexibility approach too loose, doesn’t give any certainty on expectations for onshore wind
* need to show industry support for statements re onshore wind etc
* onshore wind subsidy free – make sure this is not expected for all sites going forward
* need to think about replacement of FiTs especially if you are looking for community level developments
* rural comms strategy to enable smart meters etc
* carbon calculator – if looking at OW helping to decarbonise whole system, CC should adopt carbon intensity of wider system
* make clear the linkage/applicability of energy strategy to planning policy
* not restricted to s36
* town planners need to buy into the principles of energy strategy
* EU standards turbines
* smaller scale
	+ housing developments are good opportunity for heat networks
	+ heat needs to be brought forward
* heat and transport – need infrastructure
* CCS – major doubts, too much faith?
* CCS – energy strategy focuses a lot on this tech but it’s not proven
* industrial and supply chain strategy required to join with energy strategy
* sell industry more convincingly – link to industrial strategy
* transport decarbonisation – more emphasis on battery storage or storage in general
* energy strategy – needs to consider security
* cost comparison – public acceptance
* stress cost effectiveness of solar and wind
* more recognition of subsidy loss and definition of what is and isn’t a subsidy
* market stabilisation measures needed
* give councils decarbonisation budgets and show how that’s being delivered at lowest cost to consumer
* shared ownership – community organisations needed to link up developers and communities
* onshore wind’s role in decarbonising heat – make that connection more explicit
* even more emphasis on onshore wind decarbonising heat and transport
* low cost electricity to attract other investment
* challenge local place plans
* restoration bonds