



Imran Mohammed
Scottish & Southern Electricity Networks
Inveralmond House
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Dear Imran,

North of Scotland Wind Repowering

Scottish Renewables is the representative body for the renewable energy sector in Scotland, working to grow a sustainable industry which delivers secure supplies of low-carbon, clean energy for heat, power and transport at the lowest possible cost. We represent around 280 organisations ranging from large suppliers, operators and manufacturers to small developers, installers and community groups, and companies right across the supply chain.

Scottish Renewables welcomes the opportunity to comment on Scottish & Southern Electricity Networks' (SSEN) North of Scotland Wind Repowering paper and shape SSEN's Future Energy Scenarios. Repowering offers continued development of the renewables industry and is crucial to Scotland achieving its renewable energy and climate change targets, as outlined in the Scottish Government's draft Energy Strategy and Climate Change Plan. Repowering also presents an opportunity to encourage continued investment in Scotland and, with it, the creation of more jobs.

We welcome SSEN including Scottish Renewables' comments on its initial paper and that our response has been useful in informing SSEN's work. In particular we welcome our feedback being reflected in the following areas:

- **Asset Life:** Responses from Scottish Renewables' members suggested that modern onshore wind turbine lifetimes are usually in excess of 25 years (closer to 27 years) and therefore no significant repowering would take place in the 20-25 year timeframe set out by SSEN. We welcome SSEN considering extending its assumptions around asset lifetimes out to 30 years in its future work.
- **Transmission Energy Capacity (TEC):** Scottish Renewables provided feedback identifying various potential options available to wind farm developers for dealing with Transmission Entry Capacity issues when considering repowering. This included: increasing scale where economically viable and where sufficient grid capacity is available, extending the life of windfarms beyond their initial lifetime and overpowering sites to better make use of existing contracted TEC. We welcome SSEN using this feedback to shape the range of options that could take place when developers consider repowering.

- **Energy Storage:** Scottish Renewables provided feedback that some of our members are looking ahead to the possibility of delivering ancillary services from repowered wind/ storage hybrid projects, with the potential to include solar PV technologies. We are therefore pleased to hear SSEN is currently carrying out an analysis into how solar PV could develop within the north of Scotland to increase understanding on the role energy storage could play in the future deployment of solar PV. We look forward to seeing this analysis paper in late 2017.

Scottish Renewables also welcomes the opportunity to comment on the role of planning in the repowering process.

The role of planning

Given the major benefits presented by repowering, it is essential a supportive planning framework is developed to ensure projects can take place responsibly and efficiently. Since repowering will result in a continuation of the same kind of project on the same site, we suggest that any application is considered as one which proposes an 'existing use' and therefore has a presumption in favour of consent.

A repowering application would still require to be assessed on a range of environmental considerations, but the scope of work could be significantly reduced due to knowledge gained during assessments for the original site and data gathered during its operation. The scope should be discussed and agreed with relevant authorities and key stakeholders as early as possible to ensure that no work is duplicated and that only new, relevant information is developed.

The full planning lifecycle should be considered to look at ways in which responsible repowering can take place while streamlining the process. This will allow for a timely and efficient transition between the old and new project, to minimise disruption and ensure the opportunity for reusing any existing infrastructure is maximised. Aspects which should be discussed with statutory bodies include:

- A comparison of the new proposal against the existing site's original 'planning envelope'
- Use of pre and post-construction monitoring to assess the impact of a new project
- The scope of visual and landscape impact assessment required given the changes in turbine size and/or re-siting within the site
- Opportunities to use existing grid connections and infrastructure where practical, and redesign for greater capacity where required
- Reduced impact on aviation and radar and/or continued utilisation of existing mitigation techniques deployed for the original scheme
- Use of existing noise conditions and obligations, where there is no history of complaints
- Use of environmental and ecological information compiled for the original project application, construction and from post-construction monitoring as relevant base-line data for the new application

Relevant statutory consultees, including the Civil Aviation Authority and the Ministry of Defence, along with other key stakeholders, should also consider how repowering applications could be assessed efficiently, given existing knowledge.

If you have any questions on the comments set out in this response, please do not hesitate to contact me.

Yours sincerely,

Stephanie Conesa
Policy Manager- Large Scale Renewables
Scottish Renewables