

LUC EDINBURGH
28 Stafford Street
Edinburgh
EH3 7BD
25 May 2018

Dear Sir/Madam

VRG consultation: Extending Permitted Development Rights in Scotland Sustainability Appraisal

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 270 organisations ranging from large suppliers, operators and manufacturers to small developers, installers and community groups, and companies right across the supply chain.

Scottish renewables supports the general extensions to permitted development rights for renewable energy and storage technologies as outlined in the consultation. A supportive planning framework is critical to ensure we continue the transition towards a decarbonised energy system and extending PD rights will enable more buildings and consumers to take advantage of the opportunities for localised energy generation.

The potential impact on deployment of the selected renewable generation technologies arising from proposed changes is likely to be small. Where rights are being extended to listed buildings there will remain significant challenges in retrofitting electricity or heat generation technologies, given remaining planning constraints and the general age and condition of such buildings.

More broadly, the deployment of these technologies will ultimately rest on their ability to access revenues from the electricity market. With the Feed in Tariff set to close to new applicants in 2019, and no commitment to the Renewable Heat Incentive beyond 2021, the continued deployment of technologies supported by these schemes (solar PV, micro-hydro, small scale wind, solar thermal, heat pumps, biomass boilers) will rest on the replacements for these policies.

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Regarding the changes to district heat and supporting infrastructure, we welcome the move to implement the Scottish Government's proposals as outlined in the Energy Strategy. However, without wider reforms these changes on their own will make minimal difference to scale of deployment of heat networks.

We would be happy to work with you further in this area, and should you have any questions please don't hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink that reads "J. Mitchell". The signature is written in a cursive style with a large initial "J" and a clear "Mitchell" following.

Joe Mitchell
Policy Officer