

Introduction

This paper summarises the key points arising from the Scottish Government's draft [Onshore Wind Policy Statement](#) published alongside the [draft Energy Strategy](#).

The draft Statement highlights the Scottish Government's continued support for further development of onshore wind in order to achieve the targets in the Climate Change Act at the lowest cost. Key priority areas for supporting the sector as contained in the draft statement are detailed below.

Route to Market

The draft Statement sets a challenge to industry to develop the UK's first commercial wind farm without subsidy in Scotland. It also states that securing a route to market for onshore wind of all scales is a priority of the Scottish Government.

To help achieve this, three new areas of Scottish Government support are outlined as:

1. Efficiency of new wind farms in the consenting process

The draft statement calls for evidence on the appropriate approach to the inclusion of wind farm efficiency as a material consideration in section 36 consents guidance. It is not clear how this would apply to projects that do not fall under section 36. This is particularly relevant given proposals in the [consultation on the future of the Scottish planning system](#) to expand the range of planning applications which are subject to local review.

There will be no presumption of approval of applications including larger turbines – all applications will be assessed on their own merits. A working group will be established to consider how to design and fairly implement any such policy.

2. Facilitating cost reductions

This section recognises further cost reductions are a precondition of continued growth. It heavily references the report Scottish Renewables commissioned Everoze to undertake on [Onshore Wind Cost Reductions](#). However, it makes no comment on the recommendations from the report nor does it propose any new actions beyond reforms contained in the planning consultation.

3. Encouraging innovation

The paper references Scottish Renewables short term working group on PPAs as an example of innovation and states that Scottish Government look forward to the findings in due course. It also states that the Scottish Government are exploring the scope to offer increased PPA provision under a 'sleeve arrangement' within the collaborative contract.

Scottish Renewables welcomes the Scottish Government's continued commitment to onshore wind and will work with members to understand how they could further establish a route to market for onshore wind.

Repowering

The draft Statement sets out Scottish Government's 'clear support' for the principle of repowering. They state that 'repowering is not a new policy – it's an application for a new onshore wind development on a site where onshore wind represents the established land use or forms part of the planning history of the site.' Every repowering application should continue to be assessed on its own merits.

It confirms that established land use will be a material consideration in determination of any application for a repowering proposal.

The paper also states that SNH will ‘support the implementation of the energy strategy, including this draft Onshore Wind Policy Statement’, and notes SNH works within the requirements of the Scottish Regulators’ Strategic Code of Practice which includes the aim of supporting sustainable economic growth.

Scottish Renewables Initial Comments

Our response to the consultation will look at how repowering proposal might be further facilitated. Scottish Renewables is also in the process of developing a Position Paper on repowering. The paper outlines the significant benefits of repowering and makes several recommendations, including advocating the development of Scottish Government guidance on repowering which includes a presumption in favour of development.

Developing a Strategic Approach to New Development

This section only refers to section 36 applications and details options for developing a strategic approach for onshore wind. There are four options:

- National spatial approach
- Regional targets
- Locally coordinated approach
- Business as usual

Only the locally coordinated approach and business as usual options are open for consultation. The national spatial approach and regional targets are ruled out. The national spatial approach is believed to further complicate and duplicate established practice, while further work on economic impacts from changes in land values would also be required. The regional targets are also felt to duplicate existing work and risk being viewed as caps, generating feelings of uneven burdens on Local Authorities.

Scottish Renewables Initial Comments

Scottish Renewables agrees with the Scottish Government’s assessment of the national spatial approach and regional targets, and welcomes their exclusion as consultation options. We look forward to engaging with Scottish Government and members on the proposal for an informal, locally coordinated approach, to further understand how this might be delivered.

Barriers to Deployment

The draft statement highlights a number of barriers to deployment and outlines Scottish Government action to tackle them. These include:

- Electricity Networks
 - Scottish Government commits to working closely with Ofgem and National Grid to ensure that the impacts of proposed changes on the Scottish energy system are well represented within future reviews and taken account of in decision making.
- Civil Aviation Radar
 - renewed commitment from the Scottish Government to drive a more strategic approach to mitigating impacts of wind development on civil aviation radar
- Military Aviation Radar
 - the Scottish Government will consider options to support a more proportionate and affordable approach to mitigating impacts
- Eskdalemuir
 - Scottish Government are minded to accept the recommendation to increase the non-development zone from 10km to 15km

Protection for Residents and the Environment

This section summarises various pieces of recent and ongoing research including the CXC study on residential amenity and house prices, Peatland Policy Statement and the Carbon Calculator.

Community Benefits

The draft statement notes that uncertainty around a route to market may make it ‘tempting’ for developers to reduce their community benefits offer, but Scottish Government will continue to ‘seek developments that continue to offer community benefits.’

They are open to new models that look at ‘community benefit packages’ but reiterate that the solution is not to cease community benefits outright.

The [Good Practice Guidance](#) will be revised following publication of the Energy Strategy.

Shared Ownership

This section restates the Scottish Government’s commitment to securing a significant increase in Shared Ownership projects. However, they do not intend to prescribe any particular model through which they must be delivered. Stakeholders are encouraged to adopt the high level principles in contained in the existing [Good Practice Principles for Shared Ownership of Onshore Renewable Energy Developments](#).

Scottish Renewables Initial Comments

Scottish Renewables continues to support the existing Good Practice Principles. We are currently developing a Position Paper on shared ownership which outlines our continued support for the principles contained in the [Shared Ownership Taskforce Report](#), established by the UK Government and published in November 2014.

Scottish Renewables believes both community benefit and shared ownership policies must be reviewed in light of changing revenue support models and welcomes the Scottish Government’s commitment to explore new models, including ‘community benefit packages’.

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