

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020

This document sets out Scottish Renewables' response to the Proposed Aberdeenshire Local Development Plan (LDP) 2020 consultation.

We would encourage the council to consider our comments alongside Scottish Renewables' Position Statement on National Planning Framework 4 (NPF4)¹, as well as our Supplementary Papers on Climate Change and Deployment Targets², Landscape Capacity v Sensitivity Studies³, Spatial Planning⁴ and Peat and Carbon Rich Soils⁵. These are relevant to the proposals in the LDP, specifically the policies relating to renewables.

Section 13 'Climate Change'

Suggested changes to various policies as noted below to ensure consistency with SPP, statutory climate change targets and other policies of the Proposed LDP.

Policy C2 'Renewable Energy'

As an overarching comment, Scottish Renewables welcomes the statement in Policy C2.1 that the Council will support further applications for renewable energy developments where these are appropriately located and sized. However, it is disappointing to note that the Proposed LDP makes no reference to the climate emergency or the legally binding 2045 net-zero target.

The Proposed LDP does not reflect the aims and ambitions of the Council's own Climate Change Declaration, which states that the Council will "*update our relevant policies, to ensure they meet this declaration*". The LDP should be a key document in the delivering the Council's stated intention, but in its current form it fails to do so.

We are concerned that the renewable energy policies do not adequately reflect the severity of the climate emergency or the importance of the planning system in helping to achieve the net-zero target.

The socio-economic benefits of renewable energy development should be more broadly recognised in this section of the Proposed LDP. Positive support for renewable energy development is key to the "transition economy", and the move from an oil and gas economy to a low carbon economy. The ability for renewable energy development to utilise the skills already present in the north east region in the oil and gas sector should also be recognised.

Section 13 of the Proposed LDP and individual policies should be updated to reflect these key issues.

¹ <https://www.scottishrenewables.com/publications/560-sr-position-statement-on-npf4>

² <https://www.scottishrenewables.com/publications/623-sr-npf4-supplementary-position-statement-cc-and-deployment-targets>

³ <https://www.scottishrenewables.com/publications/621-sr-npf4-supplementary-position-statement-lcs-v-lss>

⁴ <https://www.scottishrenewables.com/publications/622-sr-npf4-supplementary-position-statement-spatial-planning-for-onshore-wind>

⁵ <https://www.scottishrenewables.com/publications/618-sr-npf4-supplementary-position-statement-peat-and-carbon-rich-soils>

Policy C2.2 'Wind Energy'

This is the main policy against which wind energy proposals will be assessed and Scottish Renewables welcomes the statement in the policy that the Council 'will approve' further wind development in appropriate locations. Scottish Renewables does however have concerns with the detailed implementation of this policy, as follows.

Firstly, this policy does not contain a set of criteria against which the Council will assess wind farm applications. There is some uncertainty about which other Proposed LDP policies would be applicable to the assessment of a wind energy application and clarity is required in Policy C2.2, to ensure there is no uncertainty on this issue. Policy C2.2 should cross refer to SPP paragraph 169, which provides a list of assessment criteria. Any cross reference with other Proposed LDP policies (see comments on policies PR1.1, R3 and R4 as examples of where clarification is required) should also be noted.

Secondly, Scottish Renewables has significant concerns over the reference to the 2014 Strategic Landscape Capacity Assessment for Wind Energy in Policy C2.2 and its potential role in the assessment of future applications. Scottish Renewables has made representations regarding the inappropriate use of Landscape Capacity Studies as a development management tool as part of our supplementary position statement to NPF4 (appended to this response). Scottish Renewables strongly disagrees with the comment in the policy that this document remains relevant, even for the larger turbines now proposed, as this statement does not take into account the significant legislative and regulatory changes which have occurred since 2014 (as detailed above).

The Capacity Study was published in March 2014. As set out above, renewable energy and greenhouse gas emissions reduction targets have increased substantially in the interim period, and there is now a demonstrably greater need for and urgency to deliver further renewable energy than there was in 2014. It is a document containing conclusions reached in a materially different context and must now be treated with extreme caution given the significant change in the energy policy landscape in the intervening period, the change in the cumulative situation (there have been 184 wind turbines consented or built since 2014) and the change in the scale of available turbine technology. If it ever was, it is no longer fit for purpose.

The Capacity Study does not form part of the Development Plan. By contrast, the spatial framework (page 86) does and this follows the Spatial Framework set out in Table 1 of SPP. Policy C2.2 should be amended to remove reference to the Capacity Study and provide greater emphasis to the Spatial Framework.

Scottish Renewables notes that the Spatial Framework Map itself (page 86), identifies 'areas with strategic capacity for wind turbine development', as required by paragraph 162 of SPP. This Spatial Framework is identical to the Spatial Framework in the current LDP and clarity on the source of this strategic capacity would be useful.

Policy C2.3

Policy C2.3 does not set out the Council's position on repowering and lifetime extensions. Given that these types of applications, as well as physical extensions, are likely to be increasingly common over the lifetime of the Proposed LDP, Policy C2.3 should be amended to clearly set out the Council's 'in principle' support for such applications. This would be consistent with the Scottish Government's Onshore Wind Policy Statement (2017) and would help ensure that the Proposed LDP creates a positive policy context to help address the climate emergency and net-zero target. It should be noted that lifetime extensions may simply include an extension in operating time, without any changes to infrastructure. Scottish Renewables suggests that this wording is amended accordingly. Where turbines are being repowered, the policy should make provision for, and support, the use of best available technology, including larger scale turbines.

With reference to the sentence 'Existing bases should be reused', Scottish Renewables suggests that this should be amended to include the wording 'where possible'. Whilst every effort will be made to reuse existing infrastructure, it is unreasonable to stipulate this as a policy requirement as it is not possible to reuse existing bases due to turbine foundations being of a bespoke design to suit the specific turbine model.

Policy C3 'Carbon Sinks and Stores'

This policy states that the Council will protect carbon sinks and stores from disturbance or destruction. As noted in other representations, these resources also benefit from protection in Policies PR1.1 and PR1.10, albeit not consistently and not in accordance with SPP. As currently worded, the Policy is not consistent with SPP, which groups carbon rich soils as a Group 2 interest in terms of the SPP Spatial Framework. SPP states that any significant effects upon these interests should be substantially overcome. This is a different and more appropriate test than that set by Policy C3, which is written in absolute terms in that these resources will be protected from any 'disturbance or destruction' and allows for no exercise of planning judgement at all. Policies PR1.1, PR1.10 and C3 should be reviewed and where necessary amended to bring them into line with SPP, as they relate to wind farm developments, and also to ensure they are consistent with each other.