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Claire Mack

Chief Executive

Scottish Renewables



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Net-Zero – from high ambition to delivery on the ground

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Lindsay McQuade

CEO

ScottishPower Renewables



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Neil Collar

Partner/Head of Planning Law

Brodies LLP Solicitors



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“However, whilst the consultative draft proposes climate change and nature recovery being the primary guiding principles for decisions with the climate emergency being given significant weight when considering all development proposals, it is also clear that there is an emphasis on consideration of various environmental factors before a proposal can be considered acceptable, as noted in draft Policy 19 which is considered most of relevance to this proposal....”

(Dumfries + Galloway Council response - PPA-170-2156)



Scott Vallance

Senior Project Manager

Statkraft



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Andy Sloan

Head of Consents Strategy

SSE Renewables



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Getting the grit out of the system – decision making timescales in a climate emergency

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Director of Policy

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**Deputy Director Onshore
Electricity Policy, Strategic
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The Scottish Government**



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Kirsten Rae

Project Manager

ScottishPower Renewables



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SCOTTISHPOWER
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Scottish Renewables Planning Conference 2022

Decision making timescales in a climate emergency – A Developer's perspective

*Kirsten Rae, Onshore Development
ScottishPower Renewables*

23 February 2022

ScottishPower Renewables – Investing in a Net Zero Future

- The UK Government has committed to a target of Net Zero emissions by 2050 and Scotland has the more ambitious target of 2045. In meeting these aims a Climate Emergency has been declared by Government – acceleration of action is both urgent and necessary
- Decarbonisation is driving the mass electrification of energy, transport, heating and industry
- It is anticipated that electricity demand will see a requirement for 30GW of new onshore wind generation by 2030 delivered across the UK - a significant, resource appropriate share to be developed in Scotland of at least 12GW
- Onshore wind is revolutionising the electricity system, supporting new flexibility services, grid resilience and key policies like the roll out of electric vehicles

We are investing in green generation and infrastructure to decarbonise the power sector and accelerate progress towards Net Zero.



£3.7bn UK Renewable capacity investment
between 2020 - 2025



Construction of over 2.1GW of onshore wind, solar PV, battery and hydrogen
establishing innovative hybrid energy parks across UK



Developing plans for a 3.1 GW offshore
East Anglia Hub



Further **5GW** onshore opportunity by 2030

Timeline for Development – the Road to Net Zero



- The Planning System is key to unlocking the economic potential of onshore wind, repowering and hybridised or co-located technologies
- The Climate Change Plan and National Planning Framework 4 Position Statement highlight the importance of the Planning System in delivering Scotland's 2030 and 2045 emission reduction targets
- Onshore wind is critical to achieving Net Zero – timely consenting process needed to reach 2030 deployment target (~ 12 GW onshore wind in Scotland) and to keep on track for Net Zero

Action points – the Road to Net Zero



CLIMATE
EMERGENCY



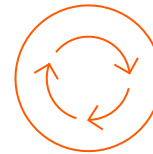
POLICY



LOCAL DEVELOPMENT
PLANS



NPF4



REVIEW OF CONSENTING
REGIME



CONSULTEES AND
DECISION MAKERS



PLI



DEVELOPERS

“Nothing changes if nothing changes, and if you keep doing what you've always done, you'll keep getting what you've always got” Earnie Larson





Robbie Calvert

Policy, Practice and Research Officer

Royal Town Planning Institute



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RTPI Scotland
Royal Town Planning Institute

Decision making timescales in a climate emergency

Robbie Calvert
Policy, Practice and Research Officer at RTPI
Scotland

Resource



Gross expenditure to planning authorities has diminished in real terms by 42% since 2009



There have been 32% staffing cuts in planning departments since 2009



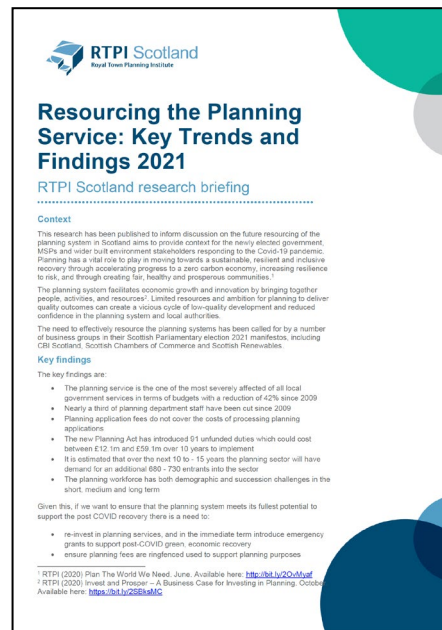
Planning application fees only cover 66% of their processing costs



In 2020 local authorities only spent 0.38% of their total net revenue budgets on planning services




There are 91 new and unfunded duties in the Planning (Scotland) Act, which could cost between £12.1m and £59.1m over 10 years



Funding the Planning Service

- The Town and Country Planning (Fees for Applications) (Scotland) Regulations 2022 have been lodged
- Reinvestment?
- Planning system requires at least £86 million (40% net revenue increase) over the parliamentary term



Funding the Planning Service

RTPI Scotland briefing paper

Key findings

This paper outlines the findings of analysis undertaken by RTPI Scotland to assess the resource needs of the planning system over the 2021 – 2026 Parliamentary term. In total we estimate that to undertake its core statutory functions the planning system requires at least £86 million over the parliamentary term. Whilst much of this essential resource can be met with an increase in fees, over £24 million needs funded from the Scottish Budget over the parliamentary term. This would equate to an approximately 40% net revenue increase to the planning system over the next five years but in terms of budgetary asks for the annual increase of local government block grants and funds, it would equate to just 0.01% of the total Scottish Budget 2021.

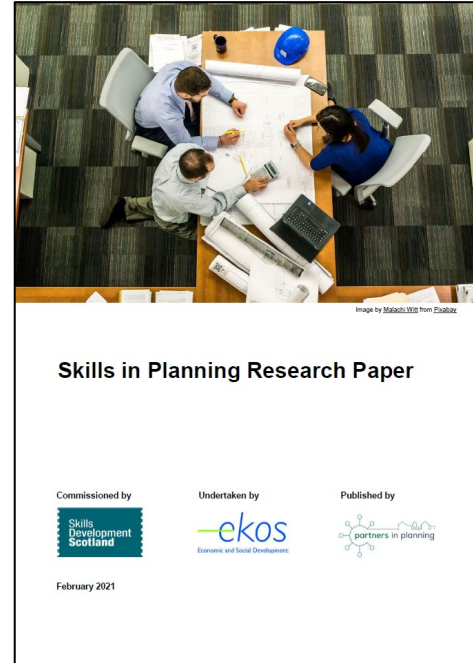
RTPI Scotland have identified key areas of the planning system where there are current and expected funding gaps. This work has made the following outline estimations:

Planning system function needing funded	Estimated funding gap over 5 years	Assigned funding source
Core cost of processing a planning application (to full cost recovery)	£61,704,289	Planning fee increase e.g. developer contributions, committed sums etc
Additional Outlets from the Planning (Scotland) Act 2019	£8,598,702	Local government block grant funding or other funds
Local Place Plans	£3,711,019	Local government block grant funding or other funds
Establishment of the Office of National Planning Improvement Coordinator	£1,629,226	Local government block grant funding or other funds
Chartered Town Planner apprenticeship scheme	£10,386,327	Block grant funding to Skills Development Scotland or other funds
	5 years Local Government Block Grant and other funds funding gap	£24,325,276
	5 years total funding gap	£86,029,566

Workforce & Skills



- Planning graduate outputs stagnated
- Only around 9% of staff in planning authorities are under 30 whilst over 35% of are over 50 years old
- An estimated replacement demand of around 500 additional planners over the next 15 years is required



Workforce & Skills

OSWPS: “A history of oil and gas expertise in Scotland, and building on our existing supply chains, means that Scotland is comparatively very well placed to build on these existing skills, and provide skilled professionals to meet the increasing demands of the onshore wind sector as we transition to net zero. **Opportunities for skilled jobs will be available throughout the lifecycle of developments, from planning through to development**, through operations and maintenance (O&M) to decommissioning and recycling.”



Future Planners Project

- How are planners recruited?
- Where do planning staff who leave local authorities go?
- Routes into the profession?
- Current means of current of attracting folk into the profession
- Increasing retention?
- How do other industries approach pipeline shortages?
- Awareness and perception of industry?
- Scope initiatives undertaken by across sectors and countries aimed at increasing entrants into their discipline
- Initiatives undertaken by other professional and trade bodies?



「
**Digital
Planning**
」

TRANSFORMING PLACES TOGETHER

Scotland's digital strategy for planning



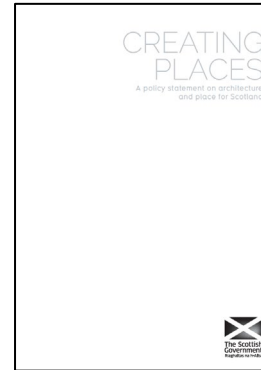
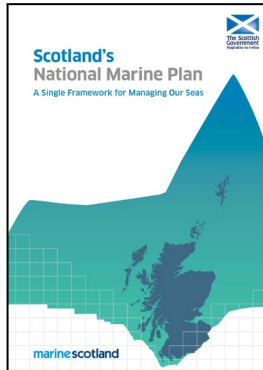
Draft NPF4 – clarity & robustness

Community Wealth Building Policy 5(b) Proposals for development within the categories of national developments and major developments should contribute to community wealth building objectives.

- *progressive procurement – developing local supply chains of businesses likely to support local employment and keep wealth within communities*
- *fair employment and just labour markets – Using anchor institutions to improve prospects of local people*
- *shared ownership of the local economy – supporting and growing business models that are more financially generative for the local economy*
- *socially just use of land and property – developing the function and ownership of local assets held by anchor organisations, so local communities benefit from financial and social gain*
- *making financial power work for local places – increase flows of investment within local economies by harnessing and recirculating the wealth that exists*

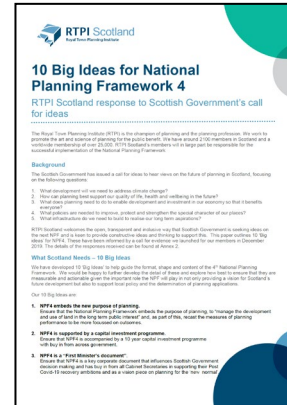
Draft NPF4 - read across and complementarity

- Read across of policies
- Spatial principles and National Planning Policy?
- Alignment with other plans and strategies?



Delivery & Monitoring Programme

- First Minister's document
- 10-year capital investment programme
- Comprehensive skills and resource strategy





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Royal Town Planning Institute

Thank you

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Getting the grit out of the system – decision making timescales in a climate emergency

Scottish Renewables Planning Conference
23 February 2022

Pinsent Masons LLP

Context

- Historic average determination period for S36 applications > 3 years
- Some signs of recent improvement – but average still ~ 2.5 years
- Timescales highly variable and unpredictable:
 - Best case: 1 year
 - Worst case: > 6 years
- Consenting timescales outpaced by technology advances = more variations

Desired System Attributes - Developer View

- Adequately resourced – consultees as well as decision-maker
- Clear, consistent & unequivocal policy, guidance and advice
- Proportionate – focussed on the important stuff
- Fixed timescales, with reasonably predictable outcomes
- Consents with flexibility to accommodate technology advancement

Key Areas for Improvement

- LPA response times – routine failure to hit 4 month time limit
- Consistency in consultee advice and positions
- Additional [Environmental] Information
- Public Inquiries
- Conditions

Options for Improvement

- Acceptance process / standards
- Fixed maximum determination timescales
- Refine the PLI trigger
- External resourcing
- Proportionate approach to EIA
- Allow applicants to draft description of development & conditions

Thank you



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Co-ordination & Energy Consents, The Scottish Government

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All a matter of balance – the reality of rebalancing the planning system

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Craig Whelton

Consenting Lawyer

Burges Salmon



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***All a matter of balance – the
reality of rebalancing the
planning system***

Craig Whelton, Partner, Burges Salmon

Contact

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Net Zero Energy Team – our 2021 highlights

During 2021 the firm's transactional energy lawyers completed **61** clean energy M&A deals, with an aggregate deal value of **£931m**

"This is the most experienced, knowledgeable, specialist and skilled team I have ever worked with in the energy sector. Second to none."

Legal 500 client testimonial

In 2021 we advised on **6** offshore wind developments

4 floating wind projects

2 successful Round 4 offshore wind bidders

2 successful ScotWind bidders

10 biomass products

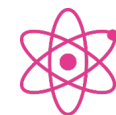
2 GW of solar projects



2 carbon capture projects



3 electric bus deals Acting for UK's Rapid Charging Fund for EVs

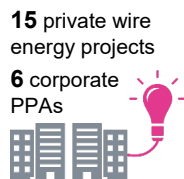


2 nuclear fusion projects
2 small modular reactor projects

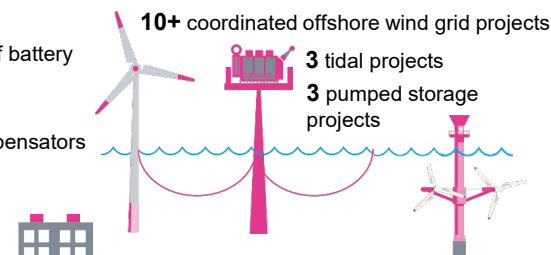


1.5GW+ of battery storage

10+ synchronous compensators



15 private wire energy projects
6 corporate PPAs



10+ coordinated offshore wind grid projects

3 tidal projects
3 pumped storage projects



15 geothermal project and **2** heat networks

H₂

4 hydrogen projects

15 energy disputes and challenges and over **1 GW** of onshore wind projects

Borges Salmon Renewables Team

Our award-winning renewables energy lawyers understand the financial, policy and regulatory challenges facing our clients and are experienced in driving renewable energy projects to completion.

www.borges-salmon.com/expertise/sector-expertise/energy-power-and-utilities/renewable-energy/

What I will cover

- The legal story to the Presumption (aka The Tilted Balance)
 - Why the Presumption matters
 - NPF4
-

SPP & Sustainability

- SPP currently includes a presumption in favour of development that contributes to sustainable development.
- June 2020 to August 2021 – Scottish Government's *sustainability interregnum*

28. *The planning system should support economically, environmentally and socially sustainable places **by enabling development that balances the costs and benefits of a proposal over the longer term.** The aim is to achieve the right development in the right place; it is not to allow development at any cost.*

29. *This means that policies and decisions should be guided by the following principles: [There follows 13 principles]*

SPP & The Presumption

SPP - Paragraph 33.

*“Where **relevant policies** in a development plan are **out-of-date or the plan does not contain policies relevant to the proposal**, then the presumption in favour of development that contributes to sustainable development will be a **significant material consideration**.*

Decision-makers should also take into account any adverse impacts which would significantly and demonstrably outweigh the benefits when assessed against the wider policies in this SPP.

The same principle should be applied where a development plan is more than five years old.”

- Presumption in favour of granting planning permission for development that contributes to sustainable development. Can be outweighed by adverse impacts that *significantly and demonstrably outweigh the benefits*.
- “The Tilted Balance”

The Presumption in Practice

- Presumption could apply, but:-

“I do not consider this proposed development would meet two of these principles...I do not consider that the presumption in favour of sustainable development would apply.”

Quarrier's Appeal, July 2019

*“On that basis **paragraph 33 of Scottish Planning Policy is not a relevant consideration** in this case and, under that paragraph, I need not consider whether any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the wider policies of SPP”*

Reddingmuirhead Appeal, March 2020



**You're not sustainable development –
you're not getting in.**

The Presumption in Court

- Three Key Court of Session Decisions
 - Graham’s the Family Dairy v Scottish Ministers (2019)
 - Gladman v Scottish Ministers (2019) (Gladman One)
 - Gladman v Scottish Ministers (2020) (Gladman Two)
- These decisions referred to English case law and use of the term “tilted balance” – *Hopkins Homes*
- Court of Session referred to the tilted balance applying in Scotland through SPP.



Gladman Two

“In determining to refuse planning permission, the counterbalancing factors require to outweigh that consideration “significantly and demonstrably”.

This is part of the equation for determining whether a development is, in overall terms, sustainable.

It is not an exercise which is undertaken after a determination on sustainability has taken place. ...”

Gladman Two - applying the Presumption

- Instruction to decision makers:-
 - *The starting point ought, on the contrary, to have been that there was a presumption in favour of this development because, inter alia, it provided a solution, at least in part, to the housing shortage.*
 - ***Thereafter, the question was whether the adverse impacts, notably the other policies in the development plan, “significantly and demonstrably outweighed” the benefits of the development in terms of the housing shortage and the economic gain.***
 - Applies to all forms of development
-

Why the Presumption matters

- Gives policy effect to policy aspiration.
- Clear guidance to decision makers, developers and third parties.
- A key function of policy should be to articulate priorities.



The art and science of blending

NPF 4 – will it deliver?

- *Sustainable Places - To achieve a net zero, nature-positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and all our decisions.*
- Policy 2 - “Significant weight” to the Global Climate Emergency (Rosanna Cunningham’s May 2019 Statement).
- Policy 19 - in principle support for renewables

BUT

- Policy 19(d) –windfarm development should be supported unless the impacts are “unacceptable”.
- *Policy 19(g) - “maintain an acceptable level of amenity for adjacent communities”*
- Policy 19(k) – Renewable energy developments must take into account 17 different considerations.
- No guidance on prioritisation – no express presumption in favour of renewable development



Will it make the boat go faster.

NPF4 – Will it re-balance the planning system?

Will it make it make decision making easier and quicker?

NPF4 – How can it help to deliver

- A list of things that are relevant – but very little guidance on how to prioritise.
 - Disconnect between the supporting text and policies.
 - Know what we are not allowed to do (NSAs/ NPs/ [wild land??]) but little positive guidance – what is “acceptable” / “unacceptable” ?
 - Where development will help deliver net zero and climate change targets – consent should be granted unless adverse impacts significantly and demonstrably outweigh the benefits
-



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Principal Project
Development Manager
EDF Renewables UK



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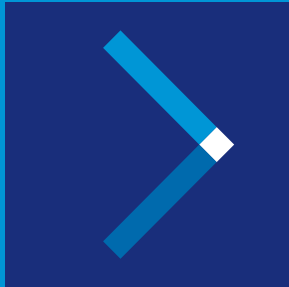


Scottish Renewables Planning Conference

Sarah Dooley

Principal Project Development Manager – Scotland
EDF Renewables UK

Introduction



Developer's Perspective – Issues

Planning Balance Expiry of Data

Delays Grid Liabilities

Determination Periods

Community Uncertainty

Deliverability

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National Planning Framework 4 - The Future

- Climate change and nature recovery are the primary guiding principles for Scotland's future plans and decisions.
- Hierarchy of priorities required in order to reach decisions on development proposals in a timely manner.
- Language throughout needs to be more positive.
- Strengthened policy required to support repowering.



National Planning Framework 4 - The Future

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Thank
you





David Bell

Director

David Bell Planning Ltd



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SR Planning Conference

Does the draft NPF4 deliver a rebalanced planning system?

23 February 2022



Key Points from the NPF4 Position Statement & 'Bute' Agreement

The NPF4 Position Statement stated:

- > "a **significant shift** is required to achieve net-zero emissions by 2045"; and that
- > "We will **have to rebalance the planning system** so that climate change is a guiding principle for all plans and decisions".
- > "we **cannot afford to compromise** on climate change. **If we are to meet our targets, some significant choices** will have to be made".
- > Prioritise emissions reduction: "climate change will be the overarching priority for a spatial strategy. **To achieve a net-zero Scotland by 2045 and meet the interim emissions reduction targets of 75% by 2030 and 90% by 2040, an urgent and radical shift in our spatial plan and policies is required**"

The Bute Agreement added:

- > Deliver an NPF that **actively enables renewable energy**
- > Deliver between **8 and 12 GW of additional onshore wind by 2030**



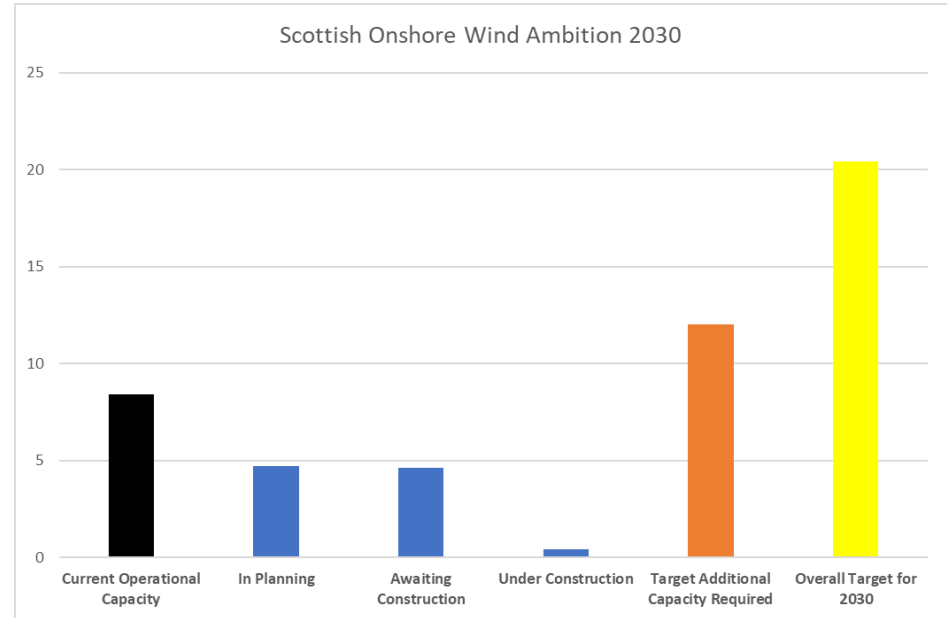
Energy Policy Framework

Climate Change (Emissions Reduction Targets)(Scotland) Act 2019

- > Net Zero by 2045 and 75% emissions reduction by 2030.

Onshore Wind Policy Statement Refresh Consultative Draft 2021

- > paragraph 1.2.2 sets out that: “***we must now go further and faster than before.*** We expect the next decade see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport and industrial processes. Some estimates from the CCC suggest that we could expect a doubling in electricity demand. ***This will undoubtedly require a substantial increase in installed capacity across all renewable technologies.***”
- > paragraph 2.1.1 stated “***This means that a consistently higher rate of onshore wind, and other renewables capacity, will be required year-on-year.***”
- > An **additional 8-12GW of capacity** estimated as required by 2030 “to meet our binding net zero commitment”



1. Mismatch with the OWPS Refresh

The draft Onshore Wind Policy Statement sets out a highly ambitious role for onshore wind over the next decade in contributing to net zero.

The expectation was that the draft NPF4 would set out an enabling policy framework to deliver on that ambition and as such would form a coherent policy framework when read together with the OWPS.

Preparing the two documents at the same time provides the opportunity for full policy alignment but it is evident that is not the result – to date.

This situation, can be rectified if various recommended changes to the text of the draft NPF4, as set out below, are accepted.



2. Rebalancing the Planning System and creating a 'radical shift'

The problem is that the draft NPF4 provides no guidance to planning decision makers as to how the planning system is to be 'rebalanced'.

Nor does it represent a 'radical shift' from the current Scottish Planning Policy and NPF3.



3. Recognition of 'National Development'

Electricity generation over 50MW capacity is to be recognised as 'national development' - which is welcome.

However, there needs to be a policy approach set out so as to avoid decision makers diminishing the weight to be afforded to sub 50 MW developments.

The Government should make it clear that:

"it should be recognised that even small-scale projects provide a valuable contribution to meeting renewables targets."

Liveable places

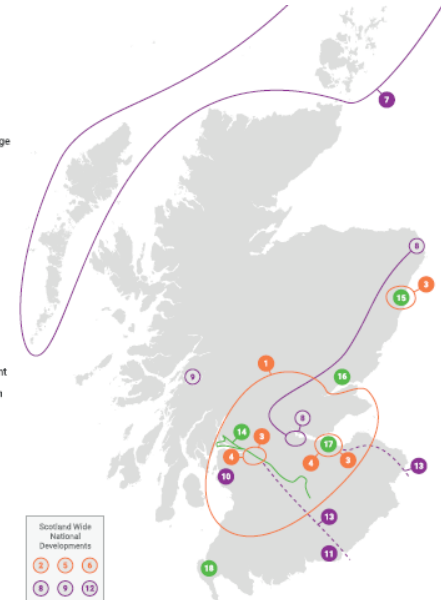
- 1 Central Scotland Green Network
- 2 National Walking, Cycling and Wheeling Network
- 3 Urban Mass / Rapid Transit Networks Aberdeen, Edinburgh and Glasgow
- 4 Urban Sustainable, Blue and Green Drainage Solutions Edinburgh and Glasgow
- 5 Circular Economy Material Management Facilities
- 6 Digital Fibre Network

Productive places

- 7 Islands Hub for Net Zero
- 8 Industrial Green Transition Zones
- 9 Pumped Hydro Storage
- 10 Hunterston Strategic Asset
- 11 Chapelcross Power Station Redevelopment
- 12 Strategic Renewable Electricity Generation and Transmission Infrastructure
- 13 High Speed Rail

Distinctive places

- 14 Clyde Mission
- 15 Aberdeen Harbour
- 16 Dundee Waterfront
- 17 Edinburgh Waterfront
- 18 Stranraer Gateway



4. Policy 2 ‘Climate Emergency’

Policy 2 ‘Climate Emergency’ sets out that “when considering all development proposals significant weight should be given to the global climate emergency”.

It not clear how decision makers will deal with this provision in striking a planning balance.

The policy should be reworded to state that significant weight “**will be given**” rather than “should be given” to the global climate emergency.

This matter also needs to be considered alongside the national importance of developments and in terms of categories of development of sub-50 MW capacity.

It is also unclear how this policy would relate to the application and interpretation of Policy 19 ‘Green Energy’ as draft Policy 19 contains a test that relates solely to a decision maker deciding whether or not the effects arising from any given proposal are acceptable or not.



5. Policy 19 ‘Green Energy’

The policy lacks a development management test which goes beyond a basic judgement of acceptability of effects.

Unless the policy is expanded to include such a test, recognising the status of the climate emergency and the national importance of renewable energy developments, then it would function in a similar way to the current SPP and would be a ‘business as usual’ approach - not a ‘radical shift’.

This would not deliver the desired OWPS and draft NPF4 outcomes.

Policy 19 needs to be adapted to include a development management test such as:

“The climate emergency advised on in Policy 2 and the legal requirement to achieve Net Zero carbon emissions by 2045 and of equal importance the 2030 interim target will be given great weight in deciding development proposals. This means granting consent for development unless any adverse impacts of the development would significantly and demonstrably outweigh the benefits of the development. Where other policies of this NPF advise on particular topics or areas of recognised importance, these must be given weight in decision making, but the test of acceptability for a development will in all cases be as set out in this policy”.



6. Policy 32 – Wild Land

Fundamental change is proposed from the policy approach in the current SPP which allows for wind energy development in mapped Wild Land Areas in certain circumstances

The draft policy is in effect, a total embargo on wind energy development in mapped Wild Land Areas.

This would be a significant barrier to the level of onshore wind deployment aspired to in the draft OWPS and in the 'Bute Agreement'. Suggested new policy:

"In determining applications for wind farms within the Wild Land Areas mapped by NatureScot regard must be had to the extent to which significant adverse impacts on the wild land qualities defined by NatureScot have been mitigated by design and the siting of the proposed infrastructure. If a development would adversely impact the integrity of a Wild Land Area, by reference to its wild land qualities, regard must be had to the effects of such mitigation and to the degree to which wild land qualities are experienced within the areas where the development would be visible. In addition, significant weight will be given in the planning balance to the extent to which a proposed development would provide benefits in terms of the Climate Emergency and the 2030 interim and 2045 Net Zero targets".



7. Policy 32 – Precautionary Principle

Criterion h) of Policy 32 refers to the ‘precautionary principle’.

The reference to “landscape” impacts in the draft policy should be removed as landscape effects will always be capable of being assessed.

The revised wording should therefore be that the approach should only apply “***where impacts of a proposed development on nationally or internationally significant natural heritage assets are uncertain***”.



8. Policy 28 ‘Historic Assets and Places’

There are fundamental problems with draft Policy 28.

No provision for balancing of harm to integrity by means of an impact on setting against the wider benefits of a development.

Even a minor impact on setting would be unacceptable under current policy wording.

Impacts on the setting of a Listed Building / Scheduled Monument are the most frequent types of harm caused by development.

The absence of a properly worded, proportionate policy is a serious and draconian policy barrier to development. New policy suggestion is:

***“For development proposals potentially affecting the setting of any Scheduled Monument, Grade A or B Listed Building or Conservation Area - any significant harm to the cultural significance of an historic asset must be justified by the need for and benefits of what is proposed. Harm to the integrity of an asset must be significantly and demonstrably outweighed by such need and benefits.*”**

For development proposals potentially affecting other designated historic assets not specifically addressed in this policy all significant harm must be justified by the need for and benefits of what is proposed. The weight to be given to such harm will depend on the status of the asset.”



9. Grid Infrastructure

The draft NPF4 is silent in terms of grid matters.

The current SPP sets out at paragraph 165 that: *“Grid capacity should not be used as a reason to constrain the areas identified for wind farm development or decisions on individual applications for wind farms”*.

This has been a very helpful policy provision as in many Appeals and Public Inquiries.

Third party groups frequently advance the argument that because there may be energy generating developments within the wider area that receive constraint payments, that this is a material factor which should be applied in determinations.

The silence in the draft NPF4 on this matter will encourage non-material and inappropriate objections to renewable energy developments.

The provision on grid matters in SPP should be carried forward into the final NPF4



Conclusions

The **draft OWPS sets out a highly ambitious role for onshore wind** over the next decade in contributing to net zero.

The draft OWPS needs to be considered **alongside** the draft NPF4.

The expectation was that the draft NPF4 would set out an enabling policy framework to deliver on that ambition and as such would form a coherent policy framework **together with the OWPS**.

The draft NPF4 **falls considerably short of providing such an enabling policy framework** and indeed in a number of respects, presents new barriers to onshore wind deployment when compared to the existing national planning policy framework in SPP.

If the issues raised are not addressed, then this will significantly compromise the ability of NPF4 to support the Scottish Government's overarching ambitions with respect to renewable energy and the attainment of Net Zero.

The opportunity remains for consultation responses to be sent to the Scottish Government until the end of March 2022



Thank You

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In the eye of the beholder – the thorny issue of visual impact

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Planning Conference 2022



Euan Hutchison
Consenting Associate Director



Landscape - the story so far

Prior to 1995 – focused on designations (NSA, RSA...)

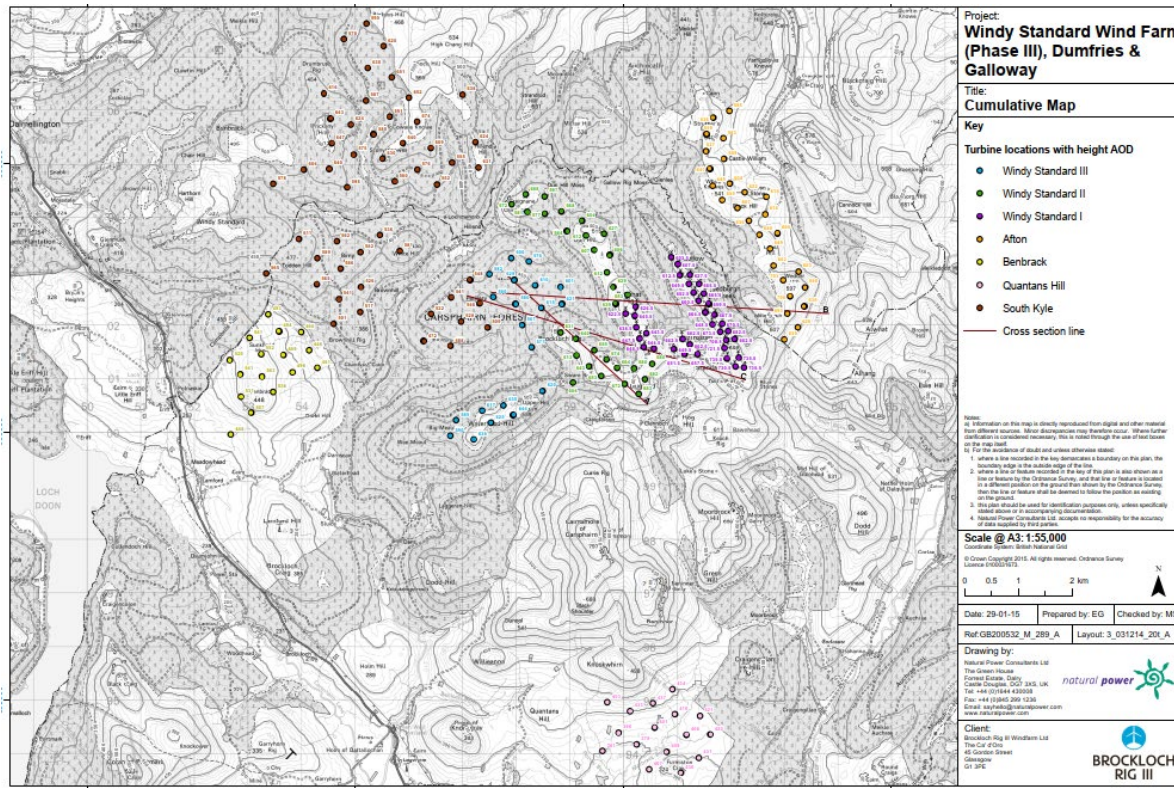
1995-2010 – Landscape Character Assessments

2010-2020 – Landscape Capacity Studies

2020-2022 – Landscape Sensitivity Studies(?)



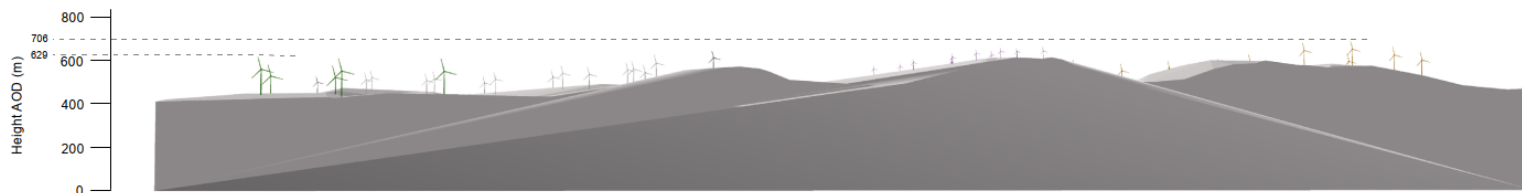
Case Study 1: Windy Standard



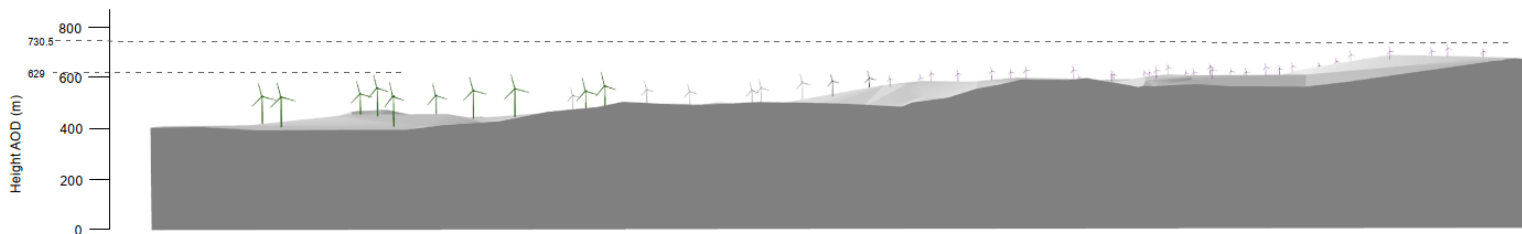
Case Study 1: Windy Standard



Cross Section B



Cross Section C





Where are we now?

OWPS: 8-12GW by 2030

Draft NPF4

Legacy of 'old' planning policies and guidance based on LCS

Nature Scot – Moving from LCS to LSS?

Case Study 2: NatureScot advice Jan 2022

Proposal for distillery and visitor centre incl. 76.5m wind turbine, Gearach, Islay.

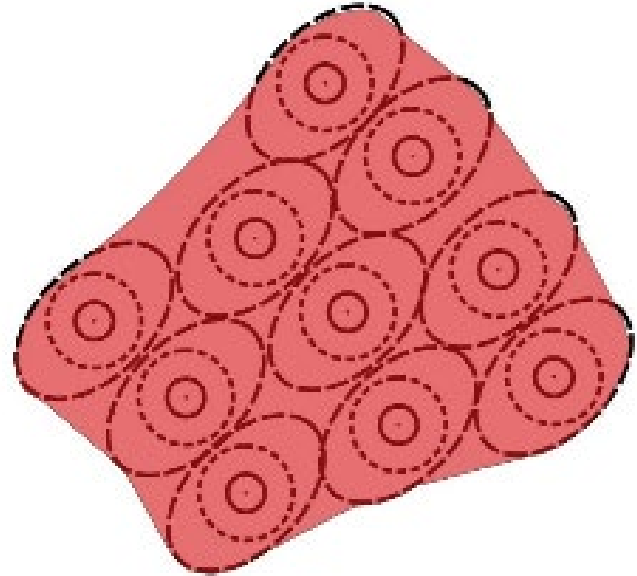
The Argyll and Bute Landscape Wind Energy Capacity Study (LWECS) Vol 1 2017.1 Main Report, p82 4.22.5, Guidance on development indicates there is 'No scope' for turbines over 50m. We advise the applicant to take cognisance of the guidance in the LWECS and explore a significant reduction in the height of the proposed turbine. As part of the EIA process, alternatives should be considered, for example, smaller turbine(s), with the aim of achieving a better landscape fit. The proposed turbine (c75-78m to tip) is of much greater height and scale than the recommendations of the LWECS.

The Challenge Ahead

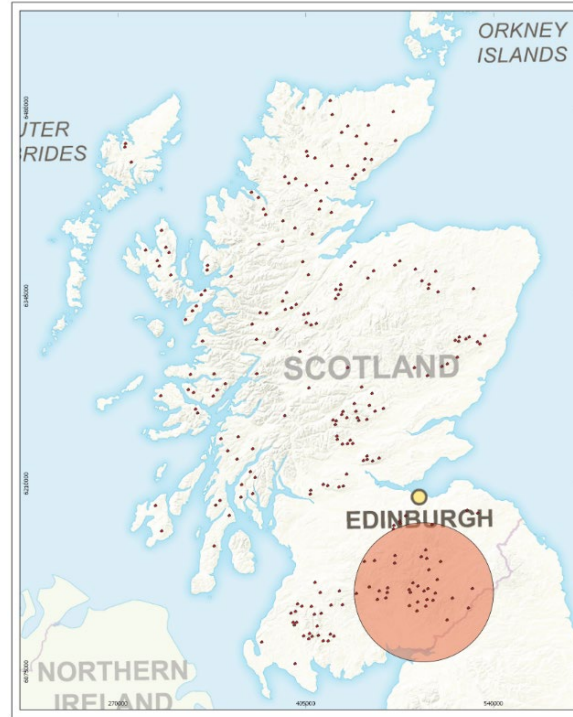
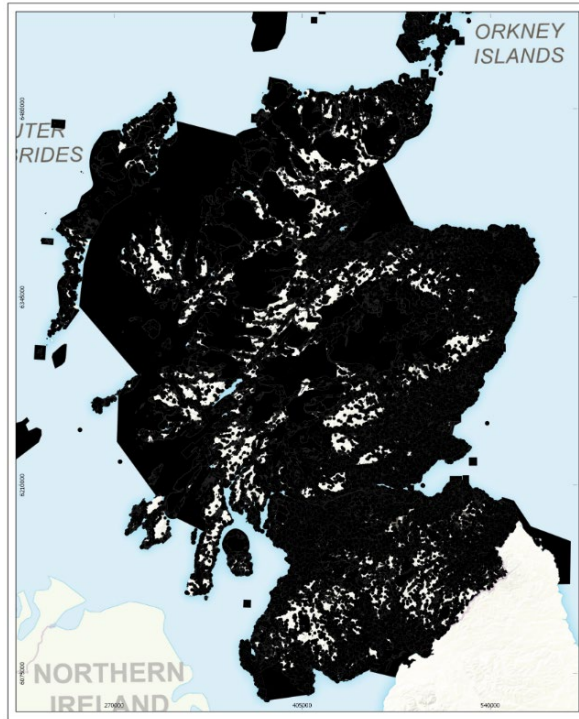
12GW by 2030 = 240 x 50MW sites

50MW = 10 x 5MW turbines x 180m tip
Each site = 250 ha

Total area = 240 x 250ha = c 600 km²
Area roughly size of NE Fife



Spatial 'Strategy' and Landscape Change



Conclusions

NPF4 requires *radical change*

Need to end arbitrary limits and capacities

Need to acknowledge sensitivities in siting, design and assessment

MUST ALL BE WILLING TO ACCEPT LANDSCAPE CHANGE

Planning should be about accommodating that change not preventing it

Thanks for Listening





Finley Becks-Phelps

UK Development Director

Fred. Olsen Renewables



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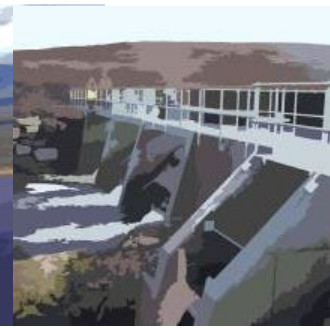
Tatiana White

Associate

ASH Design + Assessment



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In the eye of the beholder – the thorny issue of visual impact?

A Landscape and Visual Perspective.

23.02.22

Tatiana White - Associate (twhite@ashglasgow.com)

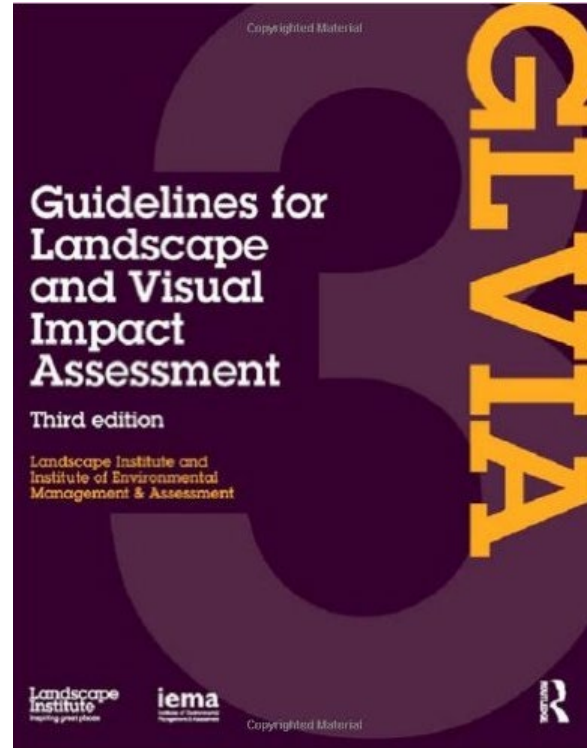
Our Complex and Layered Scottish Landscape



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GLVIA Methodology

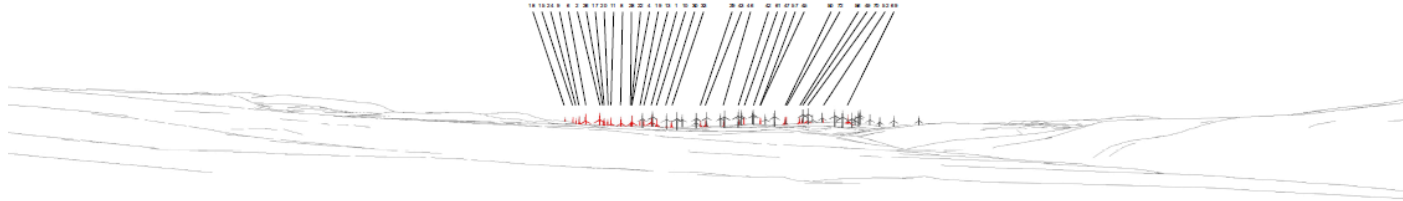
- LVIA is “a tool used to identify and assess significance of effects of **change** resulting from developments in both the landscape as an environmental resource and on peoples’ views and visual amenity.”
- “It is for the **competent authority** to judge the balance of weight between policy considerations and the effects that such proposals may have.”



Guidance and Methodology Set the Tone



Larger Turbines Can Fit In Our Landscapes



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