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29 July 2020

Dear Sir or Madam,

ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN

REPRESENTATION ON BEHALF OF SSE RENEWABLES

We act on behalf of SSE Renewables, and write in response to the Proposed Aberdeenshire Local Development Plan 2020 (Proposed LDP) which was published on the 25th May for consultation.

SSE Renewables is a subsidiary of SSE Plc, which is one of the UK's leading energy companies, involved in the generation, transmission, distribution and supply of electricity, and in the extraction, storage, distribution and supply of gas. Their purpose is to responsibly provide the energy and related services now and in the future.

SSE's vision is to be a leading provider of energy and related services in a low-carbon world. Their strategy is to create value for shareholders and society from developing, owning and operating energy and related infrastructure in a sustainable way.

GENERAL COMMENTS

The Climate Change (Scotland) Act 2009 requires Aberdeenshire Council to act sustainably, contribute to carbon emissions reduction targets and to climate change adaptation. Aberdeenshire Council are expected, along with all Scotland's public bodies, to lead by example in combating climate change and making a valuable contribution towards achieving our emissions reduction targets. The Council's 'Climate Change Declaration' recognises the climate challenge and, amongst other things, commits the Council to *"adopt a positive, genuine and collaborative spirit to working towards tackling the climate crisis"*.

SSE Renewables are therefore disappointed by the level of ambition within the Proposed LDP with regards to tackling the Climate Emergency and adopting a more positive stance towards renewable energy. Much of the Proposed LDP is a 'roll forward' of many aspects of the currently adopted LDP, while key developments and policy ambitions that have been announced by the Scottish Government since the current LDP was adopted are not reflected in the Proposed LDP. The current Proposed LDP does not set the necessary context or policy ambition required to address climate change over the lifetime of the Plan.

The Proposed LDP does not make any mention of the Scottish Government's declared Climate Emergency, nor is there any mention of the Scottish Government's net-zero greenhouse gas emissions target by 2045. These are significant statements and legally binding commitments from the Scottish Government that must be central to planning policy and therefore reflected in the Proposed Plan.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 received Royal Assent on 31 October 2019. It amends the 2009 Act and commits Scotland to a target of net-zero emissions of all greenhouse gases by 2045, alongside a series of ambitious and challenging interim targets leading towards this net-zero target. The development of renewable energy, including onshore wind, is a key component in the Government's vision to achieving this target. **The Proposed LDP should be amended to specifically reference these ambitious and challenging targets, and include a statement on how the plan will contribute to achieving these.**

In a speech to the Scottish Parliament, the Climate Change Secretary Roseanna Cunningham highlighted the important role of the planning system in achieving climate change objectives:

"...the next National Planning Framework and review of the Scottish Planning Policy will include considerable focus on how the planning system can support our climate change goals."

Section 3ZA (1) of the 2019 Planning Act is also of relevance to the Proposed LDP. This states that *"the purpose of planning is to manage the development and use of land in the long-term public interest"*. Section 3ZA (2) clarifies that *"anything which contributes to sustainable development... is to be considered as being in the long-term public interest"*. Furthermore, in bringing about changes to the content of the new National Planning Framework (NPF4), Section 2(4) of the 2019 Planning Act identifies 'outcomes' for NPF4, one of which (e) is *"meeting any targets relating to the reduction of emissions of greenhouse gases, within the meaning of the Climate Change (Scotland) Act 2009"*.

It is clear therefore that at the heart of the changes to the Scottish planning system is a recognition of the vital role the planning system must play in tackling climate change and reducing greenhouse gases. It is reasonable to conclude therefore that NPF4 will require radical policy actions in order to achieve the ambitious targets set out in the Climate Change Act.

SSE Renewables expect that NPF4 will present radical action and policy to achieve climate change targets. Whilst SSE Renewables accept the development of the Proposed LDP is well ahead of NPF4, we can conclude from the various statements and actions of the Scottish Government that they will have need for radical action and policy to achieve the Government's ambitions on climate change. NPF4 is likely to be radical in its proposals to combat the Climate Emergency – including a recognition of the need for taller turbines to meet climate change targets and that Landscape Capacity Studies are no longer a sensible or credible tool for assessment (despite the current guidance on their use from SNH). Recognition of this in the Proposed LDP would be welcomed, as this could then be carried through into the Council's new local development plan once the secondary legislative process is brought forward for development planning, and the contents of NPF4 become clearer.

SSE Renewables believe that the Proposed LDP should be amended to reflect the Scottish Government's climate change commitments and support for the further development of renewable energy developments, particularly at the scale required to meet our energy and climate change targets. An acknowledgement of the Climate Emergency and net-zero targets, and important contribution that Aberdeenshire can make in achieving these targets, should be central to the Regional and Local Visions of the plan.

POLICY C2 RENEWABLE ENERGY

The introduction to Section 13 describes climate change as 'possibly the greatest challenge facing the world today'. However, it makes no reference to the wide range of climate change legislation, policy ambitions and documents that have been published which set out key measures required to address this challenge. **Section 13 should also be updated to reflect these key issues.**

SSE Renewables welcome the statement at Policy 2.1 that Aberdeenshire Council will support renewable energy developments where these are appropriately located and sized. However, as noted above, SSE Renewables are disappointed this section makes no reference to the Climate Emergency or the legally binding targets of the Climate Change Act. The Proposed LDP must reflect these national commitments and provide a supportive local policy context to help achieve these objectives.

SSE Renewables believe that Policy 2.1 should be amended to adequately reflect the nature of the Climate Emergency and the important role of the planning system in helping to achieve the net-zero target.

Policy C2.2 Wind Energy

SSE Renewables welcome the statement that Aberdeenshire Council "*will approve wind energy developments in appropriate locations*". There are however a number of concerns with regards to the implementation of this policy.

Firstly, this policy does not contain a set of criteria against which the Council will assess wind farm applications – as per Paragraph 169 of SPP, which provides a clear list of assessment criteria to assess renewable energy applications. **Policy C2.2 should be amended to cross refer to the criteria of SPP or should be amended to include a list of assessment criteria (cross referenced with other Proposed LDP policies as appropriate).**

Secondly, SSE Renewables have significant concerns as to the reference to the 2014 Strategic Landscape Capacity Assessment for Wind Energy. The 2014 Strategic Landscape Capacity Assessment should not form part of the Development Plan, but would be a material consideration in the decision making process.

Furthermore, SSE Renewables strongly disagree with the comment that guidance is set out in the Strategic Landscape Capacity Assessment remains valid. The Capacity Study was published in March 2014 – prior to publication of SPP, prior to declaration of the climate emergency and prior to the net-zero target. It does not take into account the significant legislative and regulatory changes which have occurred since 2014, and there is now a demonstrably greater need for further renewable energy than there was at the time the Capacity Study was published over 6 years ago (and based on the 2010 SPP). The continued relevance of this document over the Proposed LDP period is highly questionable.

SSE Renewables believe Landscape Capacity Studies are no longer a sensible or credible tool for assessment (despite the current guidance on their use from SNH). Constraining development primarily based on outdated guidance is no longer acceptable in the current political climate, and a policy based upon the merits of individual projects would be more supportive and allow the scale of development required to meet climate change targets.

Policy C2.2 should be amended to remove reference to the 2014 Strategic Landscape Capacity Assessment.

Policy C2.2 also references the spatial framework mapping published at page 86. This identifies 'areas with strategic capacity for wind turbine development', as per Paragraph 162 of SPP. SSE Renewables welcomes in principle the identification of large areas of strategic capacity for wind turbine development. However, this framework is identical to the spatial framework in the current LDP and should be updated based on updated evidence.

SSE Renewables believe that Policy C2.2 should be amended to remove the reference to the spatial framework and associated map (and remove the map itself), as it is based on outdated guidance and is no longer relevant.

The policy should be worded to be in accordance with SPP/NPF4 and any other relevant detailed guidance, in order to keep up with the significant changes to national policy on climate change, renewable targets and the green recovery.

C2.3

SSE Renewables have concerns around the policies on repowering and lifetime extensions contained in Policy C2.3. Given that these types of applications 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.

SSE Renewables believe Policy C2.3 should be simplified to confirm Aberdeenshire Council's support in principle for repowering / lifetime extensions, and that proposals will be considered on their merits.

CONCLUDING STATEMENT

SSE Renewables would recommend the Aberdeenshire Proposed LDP is amended to reflect national Climate Change policy and the likely policy position of the emerging NPF4. Aberdeenshire Council should see this as an opportunity to lead the way on planning policy which can contribute to net-zero targets, rather than waiting for the publication of NPF4. This would build upon the Council's existing positive approach to accommodating wind energy developments. The climate emergency needs action now, and awaiting the publication of further guidance is not considered an acceptable policy position.

It is also strongly recommended the Council reassess their policy regarding onshore wind. SSE Renewables are committed to onshore wind as the lowest-cost new-build electricity generation in Scotland, and would welcome a similar commitment from Aberdeenshire Council. Creating a positive planning policy position which is supportive of renewable energy development will contribute to sustainable economic growth in Aberdeenshire and make a significant contribution to achieving national emissions targets.

We would welcome the opportunity to meet you to discuss these comments further if required, and would in any event be grateful if you could keep us informed of progress on the review of the LDP as it moves forward to Examination.

Yours sincerely,



Associate

