

**Highland wide Local Development Plan - Main Issues Report
Consultation Summary and Actions Sheet**

Reference Number:	HWLDP-MIR-1
Organisation/Individual:	Coriolis Energy LLP

Action:

Immediate Response Required	
Meeting required with Respondent	
Issue for Area Local Development Plan	
Further Information Required	
Other (<i>Please Specify</i>)	

If no box ticked - issues raised will be dealt with in preparation of the Proposed Plan.

Issues Raised in Response:

Purpose of Main Issues Report	
NPF2 for Scotland	
Vision for the Highlands	
Inverness and A96	
The A96 Corridor	
Phasing of Development	
Developer Contributions	
East Inverness	
Nairn	
Tornagrain	
Smaller Settlements in A96	
Caithness and North Sutherland	
Easter Ross and Nigg	
Development of Local Centres	
Wider Countryside and Fragile Areas	
Population and Housing	x
Housing in the Countryside	
Affordable Housing	
Planning for an Ageing Population	
Gypsies/Travellers	
Retailing	
Developer Contributions	
Natural, Built and Cultural Heritage	

Previously used Land	
Wild Land	
Water Environment	
Renewable Energy	x
Flooding	
Waste Management	
Air Quality	
Sustainable Design	
Business and Industrial Land	
Accessibility and Transport	
Agricultural Land	
Subdivision of Existing Crofts	
Allocation of Inbye Land	
New Crofting Township	
Small Scale New Crofts	
Coastal Development	
Forestry and Woodland	
Minerals	
Open Space and Physical Activity	
Access to the Outdoors	
Comments on Consultation Process (+ve)	
Comments on Consultation Process (-ve)	

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

To be added to consultation database for wind energy guidance.

Action Sheet Completed by:	SH
Date:	4/12/09

Director of Planning and Development

The Highland Council

Freepost SC05568

Inverness

IV3 5BR

18th August 2009

Dear Sir

Consultation Response

Highland Wide Local Development Plan

H.C. PLANNING AND DEVELOPMENT SERVICES	
25 AUG 2009	
FORWARDED	INITIALS
RH	
FILE REF:	



Coriolis Energy
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Coriolis Energy welcomes the publication of Highland Council's Main Issues Report for the Highland Wide Local Development Plan.

We have two sites in the Highland area and wish to comment on the development proposals set out within the Main Issues Report in order that we can, hopefully, influence the policy framework of the Proposed Plan.

The Main Issues Report states that *'the vision for the Highland's area sets out that the Highlands will be one of Europe's leading regions by 2030'*. At the outset we would highlight that in order to achieve this Highland Council must adopt a policy framework that decreases carbon use, promotes energy efficiency and embraces the development of renewable energy.

Highland Council policy should concentrate less on population growth to increase economic competitiveness and more on sustaining population levels, increasing the sustainable use and recycling of goods and materials, promoting public transport use, work from home schemes, green architecture, developing local commodity networks, and championing commercial and micro-renewable energy development.

Development along the A96 corridor, to the extent set out within the Main Issues Report, needs to include provision for commercial and micro-renewable energy development as part of the overall project. This will demonstrate to Europe that Highland Council is at the forefront of delivering real sustainable development. For the same reason, the Nairn bypass should be dropped from A96 development proposals as this does not in any way address the need to reduce reliance on the private car and increase the use of public transport. Likewise, new households within the Highland Council should only receive planning permission if developers can prove that their homes will be carbon neutral and include best practice in terms of energy efficiency.

Not all of the long-term growth areas within the Highland Council will be capable of accommodating commercial wind projects but where possible they need to embrace micro-renewables, waste to heat schemes, marine, hydro, hydrogen and bio fuel renewable energy proposals.

The safeguarding of the environment section highlights that clear guidance is required on the location of renewable energy developments. We would highlight that it is now widely recognised (by international and national governments and many independent scientific organisations) that climate change is the single biggest threat to our environment and way of living. In order to help counteract the dangerous levels of CO2 in the atmosphere, our reliance on oil and our dependency on CO2 emitting power sources, renewable energy developments must be fully supported by Highland Council Development Plan policy.

The Highland council area has a number of sites of international and national importance in terms of natural, cultural and built heritage. It is important that these areas are safeguarded from inappropriate development. However, the pressing need for domestic renewable electricity generation in Scotland requires that additional sites are required for wind farm development and these may need to be built within sites of local and regional importance.

Sites bought forward by developers for wind farms of local and regional importance should be assessed on their individual merits. The council should map the areas of international and national importance within the policy guidance but leave the rest of the area open to further assessment, as has been proposed in the Main Issues Report for the Highland Wide Local Development Plan. Highland Wide Development Plan policy should direct the three other Local Development Plans to adopt the same policy framework.

The preferred Option for dealing with Renewable Energy issues is supported however, it is important that the Council does not choose to identify 'broad areas of search'. In reality developer interest and preference may differ considerably from a consultant's point of view. It is important that the Highland Council identifies the areas where there is a presumption against development as this will then enable developers to avoid these areas all together. The preferred option is flawed because the development industry, in conjunction with the national grid, is constantly looking to overcome existing constraints and policy guidance must remain flexible enough to accommodate changes in technology.

I attach a detailed representation which relates specifically to Highland Councils review of their Renewable Energy Supplementary Planning Guidance strategy which we understand will be modified as part of the Local Development Plan.

We look forward to receiving a response to our submission.

Regards,


David Morris

Development Planner

Coriolis Energy LLP

Planning Representation

Coriolis Energy

Highland Council

**Forthcoming Review of the Local Development Plan
& Renewable Energy Strategy**

AUGUST 2009

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APPENDIX 1 : Site Location Plans

1.0 INTRODUCTION

- 1.1 Highland Council has been identified as one of the local authorities in Scotland to test case a new style of partnership-based Development Planning. This will include new practices for revising supplementary planning guidance (SPG) for renewable energy, replacing parts of the existing Renewable Energy Strategy and Guidelines. This SPG review will form a key part of the forthcoming Highland Council Local Development Plan (LDP).
 - 1.2 This submission by Coriolis Energy aims to influence the detail and scope of future Highland Council (HC) Renewable Energy policy, with specific regard to wind energy development. We also wish to highlight our commitment to work in partnership with HC through the duration of their Development Plan policy review. The existing HC Renewable Energy Strategy and Guidelines was formally adopted in May 2006. Since then there have been significant changes in international and national policy guidance, stemming from an increased awareness of climate change and carbon dioxide emissions.
 - 1.3 The Scottish Government's planning reforms; Scottish Planning Policy 6 (SPPG6) 'Renewable Energy' and the objectives of Scotland's National Planning Framework reinforce the requirement for strong policy guidance for renewable energy development.
 - 1.4 The Scottish Government has outlined that the planning system should encourage renewable energy projects in the preparation of development plans and in assessing planning applications. Local authorities have a key role to play as the Local Development Plan is the development driver for supporting the expansion and delivery of renewable energy projects across Scotland.
 - 1.5 Wind farm activity, in addition to other forms of renewable energy production, is on the increase within the HC area. In terms of wind farm activity there are a number of sites in operation, in construction, consented, in appeal, the subject of current applications or in scoping. Wind energy is likely to remain the main contributor to renewable energy targets over the next 10-15 years. The Scottish Government has set ambitious carbon reduction targets for 2020 and it is important that HC renewable energy policy is aligned to these national targets.
 - 1.6 This submission provides a summary of Coriolis Energy, its experience and sites within the Highland Council area, the case for further renewable energy support and recommendations to ensure renewable energy, and especially wind power generation, is fully supported by future HC planning policy.
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2.0 CORIOLIS ENERGY

- 2.1 Coriolis Energy welcomes HCs review of its SPG Renewable Energy policy as part of the LDP production. We believe a review of this policy guidance offers the opportunity for HC to adopt an innovative policy framework that contributes in many ways to the renewable energy targets of Scotland.
- 2.2 Coriolis Energy was formed in 2007 by a group of individuals previously responsible for running the renewable energy arm of one of the UK's largest electricity utilities. The company's principals have been responsible for the successful development of some twelve wind farms in the UK. In Highland these include Causeymire, Farr and the soon to be built Novar extension.
- 2.3 Coriolis is based out of Glasgow and Maidenhead and has chosen to focus exclusively on developing onshore wind farms within the UK. We currently have a number of sites under development throughout Scotland ranging from sites in Dumfries and Galloway to sites within Highland.
- 2.4 At present, Coriolis has two potential wind farm sites in the Highland area and we hope to be in a position to progress further opportunities through the HC LDP. The sites we have already secured represent good wind farm opportunities and will help HC meet its renewable energy targets in a way that does not adversely compromise local ecology, community amenity, aviation issues or landscape visual amenity. It is our intention to progress both of these sites through EIA over the next 18 - 24 months and submit for planning thereafter.
- 2.5 The two sites are Clach Liath, lying to the north of Elgin, and Dell Estate located near Fort Augustus. Clach Liath is projected to generate 45 MW of electricity while Dell Estate may have capacity for over 50 MW. Dell Estate site is likely therefore to be the subject of an application to the Scottish Government under Section 36 of the Electricity (Scotland) Act; however we recognise the involvement of HC in this process and wish to secure HC LDP support for both proposals.
- 2.6 Dell Estate lies due west of the Monadhliath Mountains and south of the small settlement of Whitebridge on the east side of Loch Ness. It is located to the east of the B862 between Fort Augustus and Foyers. Clach Liath lies within the Wyvis Forest and is back dropped by Ben Wyvis where seen from the Black Isle. It is located 19 km west of Alness and 9 km west of the existing windfarm at Novar (See location maps in Appendix 1).
- 2.7 We believe that these sites are deliverable and capable of supporting wind farm development within the national target timescales. Having assessed a number of issues at an early stage (ecology, access and residential amenity) we believe these sites can accommodate wind energy development without compromising local communities and wildlife. Recent national policy updates, and the recognition that onshore wind can play a significant part in helping Scotland reduce carbon emissions and reliance on fossil fuel power generation, mean local authorities will need to consider additional locations for wind farm development within LDPs. The inclusion of
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COROLIS ENERGY - DELIVERING WIND POWER ACROSS THE UK

both of these sites within future HC policy for renewable energy development will help the Council meet the targets set by the Scottish Government.

3.0 RENEWABLE ENERGY, CLIMATE CHANGE & THE PLANNING SYSTEM

3.1 Increased awareness of climate change and energy use requires that our Development Plan system reflects up to date Government Policy in respect of land use policy and national energy targets. Policy direction and terminology cannot afford to be ambivalent and Local Development Plan policy must encourage renewable energy investment and domestic electricity production. The challenge we face is highlighted within the 'Summary' of SPPG 6 'Renewable Energy':

"Scottish Ministers have set a target of generating 40% (since quantified as 6GW) of Scotland's electricity from renewable sources by 2020 and confirmed that this target should not be regarded as a cap. The importance of using clean and sustainable energy from renewable sources will continue to increase as a result of global imperatives to tackle climate change and the need to ensure secure and diverse energy supplies"

3.2 Two of the most pressing issues the international community faces are climate change and the rise in carbon emissions. Local authorities, the stewards tasked with implementing national targets, need to ensure that they have an up-to-date and forward looking policy framework for renewable energy development. It is clear from the existing SPG that Highland Council recognises the significant challenges we face in terms of climate change and domestic energy/electricity production. As evidence continues to mount the latest international target agreed in Italy in July 2009 has seen G8 leaders agree to limit global warming to 2C above pre-industrial levels and cut their emissions by 80% by 2050.

3.3 HC recognises the significant contribution that wind energy production can make towards meeting national targets. However, it also recognises that it is not a panacea for the UK's domestic energy demands and carbon emission targets and each element plays an important part in a diversified energy infrastructure. The target of achieving 4, 000MW of installed capacity from new renewable energy development in the Highland Region by 2020 is welcomed by the renewables industry. Through working in partnership with the development industry it should be possible for HC to co-ordinate a suitable framework for the development of renewable energy developments. We believe this will not affect the Councils responsibility to ensure that it is also safeguarding local communities and the environment.

3.4 In order that Highland remains at the forefront of the future energy market and an area where the development industry 'understands the playing field' it is important that new technologies are supported and allowed to flourish through updated SPG and the HC LDP. It is important to note that jobs from renewables will help compensate in the loss of jobs and revenue from oil and gas production over the next 10-20 years.

3.5 The HC renewable energy policy guidance for onshore wind development has largely been focused through the three categories set out within the guidance. The zoning system for national and major developments has had limited success and has not stopped developers from

suggesting alternative sites that the market feels merit development. While it was the preferred option of HC at the time to go down the route of selecting a few locations in which larger projects would be supported, by way of planning policy, with the market now moving towards projects of larger but fewer turbines it is important that policy guidance is reevaluated.

- 3.6 With the prospect of offshore wind development still not proven off the HC coastline it is of great importance that new policy guidance is put in place to support onshore wind farm development. As technology has improved, and studies have proved that turbines can function without major detriment to the local environment, development has become more economically viable. Likewise, people throughout Scotland have started to embrace the positive message that wind turbines send out in terms of 'doing our bit' to reverse climate change and secure a domestic renewable energy base. Planners have a responsibility not to obstruct clean sustainable alternatives and specifically the development of renewable energy technology across Scotland.
- 3.7 HC has a key role to play in exporting surplus renewable energy to the rest of Scotland. This can be achieved through working in conjunction with the renewable industry to ensure that development targets and grid connections are delivered while at the same time ensuring the protection of environmental designations, local ecology and community amenity.
- 3.8 The responsibility for ensuring that renewable energy technology remains an attractive investment for private finance and developers resides with national government. However, local authorities are tasked with the implementation of national targets through their stewardship of the planning system. One of the main issues which will determine whether we meet national renewable energy targets will be the effectiveness of the planning system.
- 3.9 HC LDP policies must introduce specific guidance to help the industry deliver the investment and projects required to realise greater production of renewable energy. HC must ensure that they do not adopt weak policy which is unclear and ambiguous in its meaning. At the same time it should not use jargon or technical references to back up policy advice when simple, plain English can be used to convey a point or issue. Terminology must be specific and easy to understand. It can not afford to complicate the issue of tackling climate change at a local level. Future policy must set out in detail the reasons for renewable energy support in order that local people are clear why developments end up getting built within their area. Policy should also set out exactly how targets will be met, i.e. what renewable technologies will be supported and how the local population can help facilitate climate change and reduce carbon emissions.
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4.0 LOCAL DEVELOPMENT PLAN REVIEW

4.1 The HC Structure Plan highlights the specific contribution that wind power generation can make to meeting renewable energy targets. Renewable development is supported by Policy E1: 'Distributed Renewable Energy Developments' and Policy E2: 'Wind Energy Developments', which support wind farm development where they do not have a significant detrimental impact. In terms of wind resource the Structure Plan highlights that there is significant potential for the development of further wind farms within the area. The Structure Plan also proposes that it may not be appropriate to identify preferred search areas (as directed by SPPG 6) because at the strategic level constraints may be present which are significantly difficult to assess other than on a site specific basis.

4.2 HC Local Development Plan

4.3 The HC Local Plan was adopted in 2006 and is a fairly recent statement of policy. However, as part of the forthcoming review of the LPD increased support for renewable energy needs to be reflected in revised policy. The future policy framework for the development of commercial scale wind energy development in the Highland area must also be robust and concise.

4.4 SPPG 6 'Renewable Energy' outlines strong national policy support for the continuation of on-shore wind development in order that renewable energy and carbon emission targets are met. It is clear that local authorities must take a lead role in addressing climate change and educating the public about climate change. The majority of the public remain apathetic to the major challenges we face as a nation and how as individuals they are affected by policy changes. The renewables industry is keen to work with local authorities and national government (as we are already doing through the Scottish Renewables Forum lobbying and political forums) to look at ways in which we can reach out to the majority and increase education within communities about the issues of sustainability, energy efficiency and renewable energy. The production of the HC LDP offers a great opportunity, through community participation and engagement, to provide local people with further information.

4.5 In order that LDPs across Scotland become meaningful vessels for supporting renewable energy and positive climate change they must foster a new climate of encouragement for renewable energy proposals. Policy revisions must support the delivery of not only wind power but also maximise the opportunities for investment in wave and tidal power, microrenewables, biomass and energy from waste. Holistic policy advice needs to be strong enough to filter down from the Highland wide Local Development Plan into the 3 Area Local Development Plans - The Inner Moray Firth, Caithness and Sutherland and West Highland and Islands.

4.6 We recommend that the Council formulates a policy framework that addresses the interlinked subjects of climate change and carbon emissions in a pragmatic and innovative manner. Strong leadership and clear objectives are required within the policy guidance. The development

industry needs to be certain of HC's position, in terms of renewable energy support, as key investment decisions are often based on Development Plan policy guidance. Policy advice must be detailed enough to outline the parameters within which developers must work but also practical and meaningful in order to avoid misinterpretation, time and resources.

- 4.7 The review of LDP Policy for the HC area cannot afford to fail to recognise and embrace national policy expression. Likewise, policy support must be easily transferable to the development management process in order that there is no ambiguity between local authority planning officers and elected officials within the planning committee.
- 4.8 All renewable energy projects, but in this instance specifically wind energy development, need to be supported equally at the Local Authority level as they are at central government levels. SPPG6 states that wind farm developments should be supported by development plan policies where the technology can operate efficiently and the issues of environmental and cumulative impacts can be addressed satisfactorily. Paragraph 5 of SPPG 6 states: "*Spatial policies should not be used to restrict development on sites where the technology can operate efficiently and environmental and other impacts can be addressed*". LDP renewable energy policy guidance relating to onshore wind energy development needs to build on the national policy guidance contained within SPPG 6.
- 4.9 The development plan policies contained within the Highland Council Local Plan should be based on the principle that development of wind farms will be supported where the technology can operate efficiently and where significant environmental and cumulative impacts can be addressed satisfactorily. The policy framework should actively encourage the development of renewable energy projects in a manner that gives investors confidence.
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5.0 SUPPLEMENTARY PLANNING GUIDANCE

- 5.1 The existing HC Renewable Energy Strategy provides clear guidance for increasing the Council's level of renewable energy production. With regard to commercial wind farm development, a significant amount of baseline GIS assessment was completed to identify suitable locations for wind farm development. It is clear that the existing guidance does recognise the extensive renewable resource of the area, supports renewable energy and highlights wind farm development as a practical solution to help meet national targets.
- 5.2 The Highland Renewable Energy Strategy highlights that the Council will work in partnership with renewable energy providers, operators and developers. This commitment to work in partnership with the private sector through the production and implementation of future renewable energy development is necessary with regard to the, *"Pressing need to deliver the clean energy that is required to support our way of life"*. (HC Renewable Energy Guidance)
- 5.3 The HC's existing supplementary planning guidance supports renewable energy developments, and the expansion and suitability of wind energy development, - *'renewables, such as wind, are also equal to, or better than, nuclear power production in terms of emissions and efficiency'*. However, this support is largely confined to tight geographical areas where it has been proved through GIS analysis that there will be no detrimental affects on landscape, ecology and people. In order that the development industry invests with confidence in Highland it is essential that the Council alters its policy framework for wind energy development. Most of the suitable large wind farm sites within HC have been developed; are the subject of a planning application or are currently in the process of EIA. The development industry now requires a policy framework that adheres to the guidance contained in SPPG 6 and allows developers to propose sites that meet with Council criteria. The development industry can not afford to work with stringent spatial guidance that deters developers from considering other sites, which, in reality, require assessment based on their individual merits.
- 5.4 The council has highlighted that renewable energy development will affect landscape, animals and people but ultimately this 'affect' is far less disturbing than fossil fuel and conventional power station energy production. It is necessary for future guidance to be more open and sympathetic to wind farm development proposals outwith the main GIS search areas proposed by the Renewable Energy Resource Assessment, completed as part of the existing SPG evidence base.
- 5.5 Highland Council should identify the detailed criteria that windfarm proposals need to address within the revised SPG in order that a clear approach to the assessment of commercial scale wind energy developments is undertaken by applicants. Some of the existing SPG is confusing and it is unclear what part of the evidence basis has been used for some of the wind farm policy guidance.
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- 5.6 In parts, the existing SPG is difficult to understand when considered in conjunction with the evidence base completed to form the policy guidance. Preferred areas of search do not always accord with the conclusions of Highland Council's own HRERA study. In order to ensure that wind farm development is fully supported by the Development Plan review it is important that the SPG guidance is seen to relate to the conclusions and recommendations of the evidence base. We believe however, that a contributory factor in this difficulty is that a GIS accumulation of negative constraints does not itself identify the best locations for projects, merely perhaps identifying least constrained areas without properly assessing those constraints against proposals. We are convinced that the only effective method of judging the acceptability of a project is by detailed environmental assessment of the site, backed by careful design informed by the initial results of that assessment.
- 5.7 Therefore, while HC may choose to identify broad areas of search in the revised SPG it is critical to note that other sites, and indeed all sites (whether within or outwith broad areas of search) should be considered on their individual merits against robust and identified criteria. It is clear that HC strongly supports use of the EIA tool as an effective way of deciding the suitability of a renewable energy project. We would like to see the use of EIA for future wind farm sites supported by way of an alternative wind energy development policy, which overrides the need for sites to fall within broad areas of search.
- 5.8 The concerns associated with wind farms are well documented, but in addition to the issues highlighted by the media (scenery, tourism community amenity, RSPB) there are also a number of project details which strategic policy guidance does not take on board and remain uncertain until detailed site analysis is completed (access, grid connections/cost, geo-technical issues, hydrology, protected species). This can result in a site being dropped by a developer even though it is identified by SPG GIS as a broad area of search. Future SPG guidance should avoid this potential pitfall by removing the need to comply with SPG search areas and instead identify criteria based on the principles and requirements of EIA to assess the acceptability of individual windfarm development proposals.
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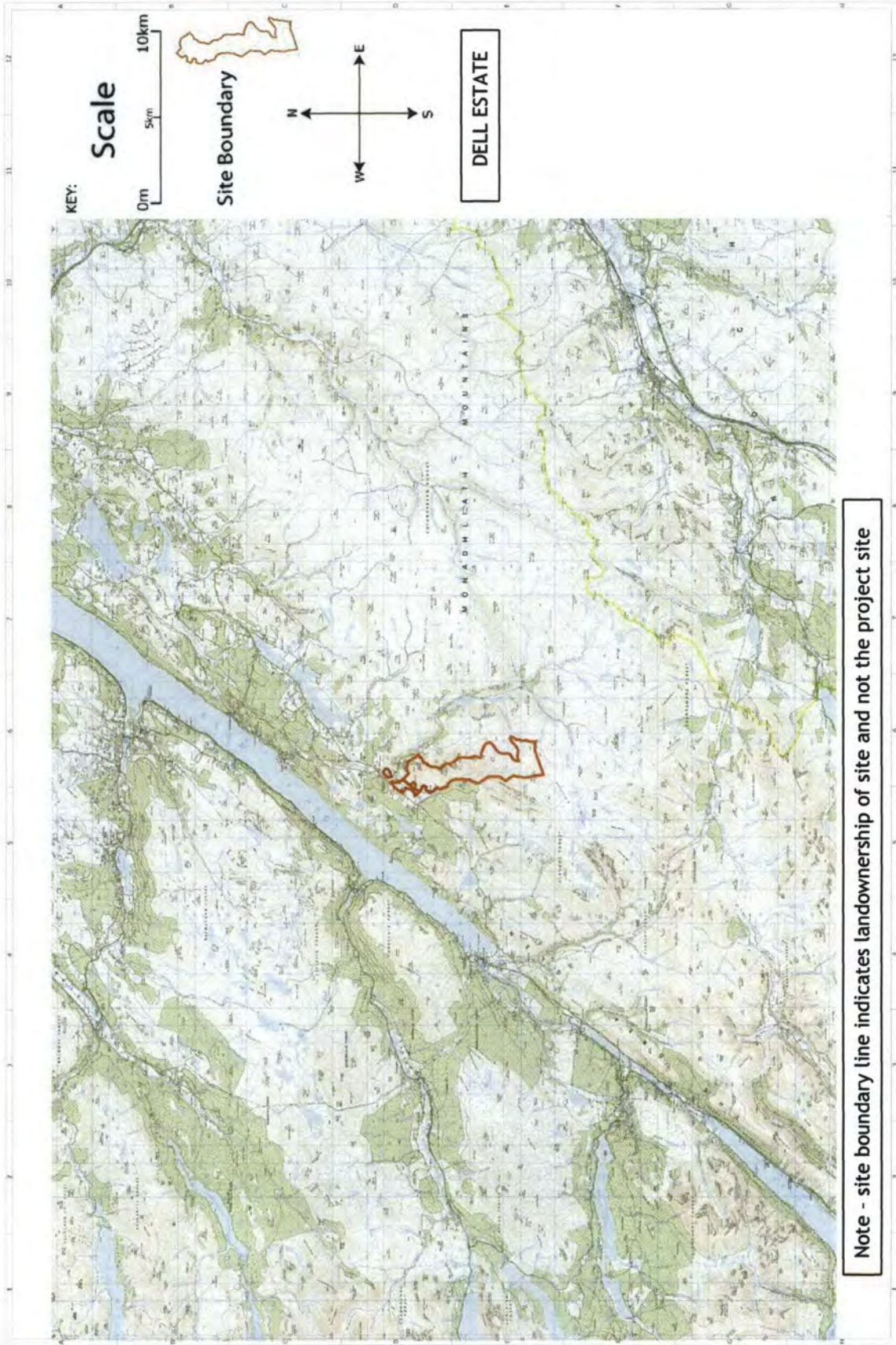
6.0 CONCLUSIONS

- 6.1 The renewables industry requires strong leadership within policy guidance and while the industry recognises the effort already put in by Highland Council in terms of addressing renewable energy, climate change and carbon emissions it is keen to see even greater support from HC within the updated SPG and the LDP review.
- 6.2 Wind Energy SPG and LDP policy should not identify areas that might be suitable for wind farm development based purely on the findings of GIS analysis and assessment. Local Authorities that have adopted this methodology have identified areas that are sometimes constrained in other ways (physical access, rare bird species and grid capacity). Instead, development plan policy needs to identify areas within which wind energy development will not be supported, and outline the reasons why this is the case, and then provide a clear list of criteria that developers must address in order to prove that sites outwith these areas are suitable for development. In order to meet renewable energy targets Highland Council needs to adopt a policy framework that underlines the need for sites to be assessed on a site by site basis through the production of a comprehensive EIA.
- 6.3 As Highland Council moves forward with the LDP and Renewable Energy SPG review we wish to highlight our willingness to work with the Council to formulate policy guidance that ensures that it meets its renewable energy targets. Effective policy guidance needs, in part, to be shaped by developers and operators working in partnership with the Council, local communities, statutory and non-statutory consultees if it is going to make a real difference within a specific area.
- 6.4 HC needs to ensure that issues such as ecology, natural and historical heritage and communities are safeguarded by renewable energy policies but at the same time it will need to recognise that often there are solutions for many sites that at first seem constrained. The wind farm industry has successfully worked with the RSPB, SEPA and SNH on a number of projects to overcome some of the above issues. Technological advancements, greater understanding of development issues and the recognition that renewable energy can help rectify some of the world's climate ills mean it is essential that wind farm proposals should be actively encouraged throughout the Highland area.
- 6.5 We trust that this submission highlights our requirement for strong renewable energy support for wind farm energy within the forthcoming Renewable Energy/LDP review.

David Morris MRTPI
Development Planner
July 2009
For Coriolis Energy

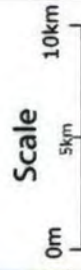
APPENDIX 1

Site Location Plans





KEY:



Site Boundary



CLACH LAITH

Note - site boundary line indicates landownership of site and not the project site