

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

Reference Number:	HWLDP-MIR-40
Organisation/Individual:	International Power Marine Developments Ltd (James Minto)

Action:

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

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	x
Easter Ross and Nigg	
Development of Local Centres	
Wider Countryside and Fragile Areas	
Population and Housing	
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:

Comments regarding marine energy development
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Action Sheet Completed by:	GW
Date:	8/12/09

Dawn Sutherland

From: James Minto [REDACTED]
Sent: 27 October 2009 12:56
To: devplans
Cc: David Cowie
Subject: Local Development Plan Consultaton

Dear Sirs,

Please find attached our response to the consultation on the Main Issues report for the Local Development Plan. It is restricted to the questions which relate to marine energy development in which the firm is engaged.

Kind Regards,

James Minto
Marine Developer

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Highland Council Local Development Plan

Response by International Power Marine Developments Ltd

27th October 2009

Caithness & North Sutherland

We think we should:

- identify the key development priorities for Caithness in the Proposed Plan
- put in place policies which support the growth of marine renewables in the Pentland Firth and the facilities and industry required to support them; and
- provide updated guidance in the form of an updated Dounreay Planning Framework which will be adopted as Supplementary Guidance.

Q.8 Do you agree with our Preferred Option? If not, please tell us why. Are there any other alternatives that should be considered?

The Local Development Plan should specifically reference National Developments under NPF 2^[1] such as the Beauly – Dounreay electricity grid reinforcements.

“The Local Development Plan must enable and support the delivery of on-shore facilities, services and sites to ensure that this important inward investment opportunity is capable of being delivered (p23)”.

We welcome this statement and the inclusion of Nigg Development Master Plan (p26). We think the Plan should also specifically reference the development of Pentland Firth ports of Scrabster and Wick.

Renewable Energy

We think we should:

- set out updated targets for energy developments of different types – these targets will be a guide, and not a “ceiling”;
- identify broad areas of search where different types of renewable energy technology developments, especially larger on-shore wind and the location of land based supporting development for marine renewables, could take place. This will be included within supplementary guidance;
- identify areas to be given protection from these types of development and this will also be included within this supplementary guidance;
- set out criteria for consideration of proposals in the rest of the Highland area for these types of development and this will also be included within this supplementary guidance;
- identify the opportunities and potential locations for any supporting infrastructure relating to manufacturing, assembly, servicing and maintenance; and
- support smaller developments for micro-renewables.

Q.23 Do you agree with our Preferred Option? If not, please tell us why. Do you prefer the stated alternative? Are there any other alternatives that should be considered?

We agree with updated targets for energy development. These should be consistent with the targets of other agencies for instance the Crown Estate's target that 700MW of tidal energy should be deployed in the Pentland Firth by 2020^[2]

We agree that broad areas of search for renewable energy should be carried out. We welcome the Scottish Government's recognition in NPF2 that "The potential of some renewable energy technologies has a strong spatial dimension" (para 146). Good areas of tidal resource are only found in certain locations therefore it is important that the Development Plan takes account of this. Furthermore, once the Crown Estate leasing round is settled in 2010, developers will not be permitted to develop outwith the designated leased areas.

We see that there is already a robust system of SPA's, SAC's, SSSI's, AGLV, GCR's and an emerging network of MPA's through the Scottish Marine Bill. The case for any further areas to be "given protection from these types of development" should be explicit in the Development Plan.

Although the Council's Renewable Energy Strategy is primarily focussed on creating a spatial planning framework for onshore wind in response to SPP6, it is important that emerging marine energy developments are included. There should be a joined up approach between the Renewable Energy Strategy, the Coastal Development Strategy and the Scottish Governments Marine Spatial Plans.

We strongly object to the alternative option that renewable development should only take place "where there is capacity in the national grid to take the additional electrical load". NGET and SHETL will only proceed a grid connection upgrade where there is an application submitted by a developer. Developers will not be able to post the required financial security if there is no route to achieving planning consent for the development. This "chicken and egg" situation must be avoided at all costs.

We welcome the statement "We will be working closely with the Scottish Government to ensure that the proposals in the marine spatial planning activities fit well with the aims of our Highland wide Local Development Plan."

We ask for clarity on how this will be incorporated in the Development Plan particularly in regard to ensuring that shore based and littoral zone development required for marine energy is in kept in step with offshore development.

References

[1] <http://www.scotland.gov.uk/Publications/2008/12/12093953/4>

[2] <http://www.thecrownestate.co.uk/newscontent/92-pentland-firth-tidal-energy-project-3.htm>