



CONSULTATION ON DRAFT SCOTTISH PLANNING POLICY (SPP) 6: RENEWABLE ENERGY

FULCRUM CONSULTING COMMENTS

Date:	06 October 2006
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The following note comprises a short summary of key comments from Fulcrum Consulting on the Draft SSP6 consultation. We have attempted to capture points as succinctly as possible, however would be willing to expand further on the points raised on request.

Paragraph Ref.	Fulcrum Comments
8.	Good to recognise and promote need to address development of distribution and transmission networks, however there is little substantive guidance on application of this proposal
11. & 18.	<p>We agree strongly with importance of community participation and engagement, but it is important to be wary of confusion and complications that may be caused by too much locally applied variation in policy with respect to the technical and globally relevant issue of renewable energy.</p> <p>Whilst technology selection should be a locally specific issue, the terminology and wording with respect to policy requirements can be more clearly communicated if it is consistent throughout different constituencies. The drivers with respect to climate change mitigation and sustainable development in most cases are not regionally specific and for those that are (e.g. flooding), it should be possible to develop a national policy wording that can be applied in a locally specific context.</p> <p>Consistent and clear terminology and wording will be valuable to improving the ability of the public to positively engage with policy. This is something that has not been achieved successfully in England and Wales due to a wide variation in policy wording and local and regional policy interpretations leading to significant confusion and mis-information throughout the construction industry. A few organisations have been well placed to engage in depth with the technical reality and significance of these variations, however it is our view that not enough technical understanding is present in the UK construction industry as a whole to support</p>

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	<p>effective implementation of the policies.</p> <p>Fortunately our own organisation has been well placed to engage with the technical complexity of the variations and their engineering implications, however in the wider industry there is not enough skills-base currently to give us confidence in the effective implementation of local renewables policies, in particular the 10% renewables policies. This is another reason why clear and consistent national-level guidance and technical policy wording is vital to successful implementation of such policies.</p> <p>There are significant difficulties at present in England with respect to skills and resources required by Planning Authorities for development and management of their own specific bespoke sustainability and renewables policies, and their implications. If more national-level policy wording existed then centralised advice and support to local Planners could be applied more clearly and efficiently at a local level.</p> <p>Although at some level planning policy development may need to open to local consultation, the ability for local people to give informed opinion on the issues of renewable energy is very limited and as such frameworks should be quite developed to limit and focus policy consultations.</p> <p>As a minimum we would recommend an agreed national-level ‘glossary of terms’ including renewables definitions.</p>
12.	<p>We would recommend that some specific guidance is provided to authorities with examples of policies that might be of value to such communities.</p> <p>Would propose wording should be strengthened from ‘<i>should</i>’ to ‘<i>must</i>’.</p>
13.	<p>Wording “Planning authorities ‘<i>may</i>’ facilitate” does not seem to provide any active encouragement. Perhaps a more positive wording such as ‘<i>should</i>’ or ‘<i>are encouraged to</i>’ would be more meaningful.</p>
15.	<p>More specific reference/guidance regarding the nature of the activities that are considered to contribute to the priorities, e.g. the fact that renewables manufacture is one such potential contributor, would add far more weight to this statement.</p> <p>Also, as it currently reads, the wording is such that there may be economically positive initiatives that might be very environmentally harmful, and against the principle intentions of the policy, that could in fact use the statement wording to their advantage.</p>
18.	<p>Refer to ‘11.’ Above.</p>
40.	<p>Are the planning authorities being supported with technical guidance on reaching the conclusions described? Will these conclusions be robustly checked/verified? Both these items will be essential for successful implementation.</p>
45.	<p>Suggest wording changed to “development plan policies <i>must</i> encourage and support micro-renewables proposals”.</p>

<p>46.</p>	<p>Any particular renewables percentage requirement should not necessarily be linked to on-site generation only and should give the opportunity for direct investment in new renewable energy offsite. Much higher percentages of renewable contributions can be achieved at a better economic return if this is the case.</p> <p>We would suggest, from experience, that although most developments are able to achieve 10% CO2 reduction from renewables with relative ease, there are a good proportion of developments, particularly in urban areas, where achieving 10% renewables on-site is being demonstrated to be outside the bounds of commercial 'viability'. This means that many developments are actually achieving much less than 10%, despite the policy requirements stating 10% minimum.</p> <p>If off-site investment in new renewable energy installations was permitted, then much more cost effective use can be made of the financial investment made. This means that higher % CO2 reduction can be achieved for the same capital investment, which in turn equates to a valuable opportunity to build a far greater contribution to Scotland's energy mix from renewable energy.</p> <p>Fulcrum have been involved the development of approaches to achieving off-site investment via merchant renewables contracts for a number of large-scale residential and mixed-use development projects in the UK and we would be happy to discuss further our experiences and thinking with respect to this issue.</p> <p>If required % CO2 reductions were to be from a combination of energy efficiency measures and renewables, rather than from renewables alone, then an on-site reduction of between 20% and 30%, beyond building regulations minimum compliance, should be possible for most schemes. This of course is dependent on the minimum building regulation standards, but our assertion is based on standards under Part L 2006 for England and Wales.</p> <p>We would also strongly recommend the consideration of policy requirements which include some element of enforcement post-planning. We realise that there are skills and resource issues that would need to be addressed, however we feel that such enforcement is imperative to achieve the objectives of the policy. In a commercial environment engineers in England are currently being forced to advise clients that they can comply with 10% renewable requirements by merely providing the renewable technology equipment, even if they have no intention to have it commissioned or used. Effective design of systems is also not enforced.</p> <p>A possible resolution to a wording for the requirement could be something akin the following: "A minimum CO2 emissions reduction of [30%] must be achieved for the development by comparison to a building regulations minimum compliant scheme. This must include a minimum of [20%] CO2 emissions reduction from renewable energy, 5% of which must be achieved from on-site renewable energy systems."</p> <p>Although the above wording does not appear simple, it aims at being technically robust, suitably specific and contractually clear. Certainly by comparison to the variations in wording being applied by local authorities throughout England and Wales, it would be a major improvement.</p>
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