

NPF 3 Main Issues Report: Consultation Questionnaire

Please send your response to npfteam@scotland.gsi.gov.uk by July 23, 2013.

RESPONDENT INFORMATION – this is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Orkney Renewable Energy Forum

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

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3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

A LOW CARBON PLACE

1. How can NPF3 support the transition to a largely decarbonised heat sector?

Could NPF3 go further in supporting a spatial framework to help achieve our ambition of decarbonising the heat sector and guiding the necessary infrastructure investments?

This section of the framework could be bolstered by providing information including web links to the existing and planned district heating systems. It is not specified in the document what current percentage of heat demand is met from renewable sources in relation to meeting the 11% target that has been set, making it difficult to gauge whether the target is ambitious or not.

The document does little to 'guide the necessary infrastructure investments' i.e. it does not indicate where these should be made, what is specifically required, who will provide or at what cost. Admittedly this is a spatial planning framework, however this does not preclude the fact that more information is needed to stimulate and bring about necessary confidence amongst potential investors and developers that such projects would be viable and supported.

2. How should we provide spatial guidance for onshore wind?

Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government's proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?

Should NPF3 identify and safeguard those areas where we think there remains the greatest potential for further large scale wind energy development? Where do you think this is?

Should further large scale wind energy development be focused in a few key locations or spread more evenly across the country?

Is spatial guidance for onshore wind best left to local authorities?

SPP already protects areas of wild land character but this has not yet been done spatially by many local planning authorities. This leads to inconsistent approaches from planning authorities where subjectivity can be permitted to justify refusals of onshore wind developments where it is not made clear to applicants that these areas are unsuitable before committing to pursuing development proposals. An assessment of SNH's wild land character areas needs to be carried out by an independent body to ensure that they have been identified both systematically and fairly. This would ensure that wind farm developers were given accurate and consistent spatial information about which areas are 'no go areas' for wind farm development. Rather than the current situation where the categorisation of wild land is open to interpretation and means it is not clear whether it may or may not be suitable for wind farm development.

NPF3 should definitely identify areas to be safeguarded for large scale wind

energy development. The considerations that should be taken into account in designating such areas should be proximity to settlements and housing, grid infrastructure constraints, wind resource, landscape capacity and environmental designations.

Local authorities require greater levels of support in devising spatial plans for onshore wind and these require more robust assessment by DPEA. There are far too many subjective policies governing onshore wind which has led to inconsistent approaches to determination, unnecessary delays and costs for developers.

3. How can onshore planning best support aspirations for offshore renewable energy?

Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?

The pre-ambule in this section of the main issues report is clear evidence that it is not known what is required and that no sufficiently detailed strategic plan exists on how the grid should be improved and upgraded to best serve the offshore renewable energy sector including where the best landing points are required. Existing grid constraints and lengthening delays in providing improved links are already threatening the development offshore renewables and the benefits that Scotland can secure from this valuable industry. The question of whether this should be made a national development is unanswerable without detailed evidence of what is required being gathered from the grid operators and the developers themselves including timings for delivery.

4. How can we support the decarbonisation of baseload generation?

Do you think that NPF3 should designate thermal power generation at Peterhead and/or a new CCS power station at Grangemouth, with associated pipeline infrastructure, as national developments?

Is there also a need for Longannet and Cnockenzie to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

No, carbon capture and storage goes against the principles of renewable energy generation by relying entirely on non-renewable fuel sources. Base-load generation should be secured through renewable sources supported with storage. These should be made national planning objectives in favour of CCS - If CCS can be brought online by 2020 as hoped by the technology developers, the unit cost of renewable energy production would be much less, so it is neither a cost effective nor sustainable energy production solution.

5. What approach should we take to electricity transmission, distribution and storage?

Should we update the suite of grid enhancements and include the landfall of a possible interconnector from Peterhead? What projects should be included?

What more can NPF3 do to support the development of energy storage capacity?

It is welcomed that subsea cable links to Orkney, Shetland and the Western Isles are to remain a priority, but regardless of them being designated previously as national developments under NPF2, the dates for installation to Orkney have been unacceptably delayed causing measurable harm to existing renewable generators and those currently under development. Scenarios need to be explored regarding the economic cost of further delays to ensure that no further slippage is allowed. The Scottish Government needs to assess the harm caused to generators by further delay and missed opportunities. Ofgem simply does not take account of this in its current approach.

Export is an admirable goal but without adequately connecting existing renewable projects greater emphasis must first be placed on ensuring that it is enabled to export to the grid to its full capacity. Storage provides a means whereby Scotland's own energy could be entirely met from renewable resources. Greater incentives to develop storage solutions must be identified as part of the national planning framework. Suitable areas for pumped water storage and heat storage should be designated as national priorities.

6. Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?

Are there consenting issues or infrastructure requirements at NRIP sites that should be addressed in NPF3 through national development status or other support?

In theory the designation itself should help to facilitate investment, but existing renewables projects are already being inhibited by a lack of delivery via designations that have not been backed up with enough support to enable projects to be connected to their full potential. Delays are causing significant problems. The strategy should have a time element to it. When can the facilities highlighted in the national framework be expected to be brought forward? Which ones should be provided first? There is very much an aspirational element here which requires to be bolstered with a strategy of 'which should be provided first', rather than a 'here is what we might need one day approach'.

A NATURAL PLACE TO INVEST

7. Can NPF3 do more to support sustainable use of our environmental assets?

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Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?

Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?

No, it is considered that the document as proposed goes far enough.

8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?

Would it be helpful for NPF3 to highlight the particular significance of habitat enhancement and compensatory environmental measures around the Firth of Forth? Which projects can deliver most in this respect?

Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?

Yes it would be helpful.

There will be others but it is unlikely that any are of such national importance that they would merit inclusion in the national planning framework.

9. Can NPF3 do more to support sustainable tourism?

What are the key national assets which should be developed to support recreation and tourism?

Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

The list of tourist destinations and attractions is very limited and is not inclusive of many rural areas of Scotland where tourism plays a much more significant role in local economies. National policy should recognise this fact and rather than concentrate on established locations and attractions should identify what more remote areas may require and if there are any common themes to build on. NPF3 could concentrate on green energy trails celebrating the best of Scotland's renewable developments.

10. Can NPF3 do more to support sustainable resource management?

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Should NPF3 support a decentralised approach to provision for waste management or should NPF3 make provision for more strategic waste facilities?

Should the Metropolitan Glasgow Strategic Drainage Plan be retained as a national development in NPF3 or should we replace the focus on it with a broader, national level approach to sustainable catchment management?

A decentralised approach is sensible however stronger support could be shown by clearly stating a presumption in favour of waste to heat district heating systems as just one example.

The MGSDP covering so many local authority areas is also best classified as a national development to ensure consistent decision making

A SUCCESSFUL, SUSTAINABLE PLACE

11. How can we help to consolidate and reinvigorate our existing settlements and support economic growth and investment through sustainable development?

What more can NPF3 do to support the reinvigoration of our town and city centres and bring vacant and derelict land back into beneficial use?

How can NPF3 support our key growth sectors?

Should the Dundee Waterfront be designated as a national development?

Should the redevelopment of the Ravenscraig site be designated as a national development?

Could NPF3 go further in indicating what future city and town centres could look like, in light of long term trends including climate change, distributed energy generation and new technologies?

How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?

£2million for regeneration of vacant buildings in town centres for affordable housing is a very limited sum of money that may only be able to support a very limited number of projects. The recognition that dispersed rural development linked with the potential for clustering to facilitate low carbon objectives is welcomed.

Heriot-Watt University's Orkney Campus should be included in the text for its contribution to marine renewables.

Dundee Waterfront probably should be designated a national development.

Ravenscraig has been designated for redevelopment for many years. More intelligent solutions such as tax exemptions should be used to facilitate its redevelopment.

In terms of indicating what town centres may look like, this may not bring about tangible benefits and may be an expensive process with large potential for inaccuracies.

The framework should strive to identify what the key challenges facing remote and fragile rural areas are and what common themes emerge in order to better target how development can best be facilitated, what intelligent solutions can be applied, eg tax incentives etc.

12. How can NPF3 best contribute to health and wellbeing through placemaking?

Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?

No comments to make.

13. How can NPF3 help to deliver sufficient homes for our future population?

Are there spatial aspects of meeting housing needs that NPF3 could highlight and help to tackle?

NPF3 does not appear to take account of future demand for housing arising from planned expansion of industry. Rather it utilises existing studies in the level of housing provision to date. For example in Orkney if the planned expansion in renewables is to be met, then this would mean a significant increase in the current level of housing demand. This could be the case elsewhere in Scotland and analysis should be carried out at a strategic level to ensure that local planning authorities take cognisance of future demand in light of expanding industry and are supported in this undertaking.

A CONNECTED PLACE

14. How can NPF3 help to decarbonise our transport networks?

Is our emerging spatial strategy consistent with the aim of decarbonising transport?

Are there any specific, nationally significant digital infrastructure objectives that should be included in NPF3?

Should NPF3 go further in promoting cycling and walking networks for everyday use, and if so, what form could this take at a national scale?

Considerable financial and environmental savings could be made by utilising greater levels of electrification and more fuel efficient transportation.

Rather than just supporting charge point installation for EVs the Scottish Government should identify the best areas for EV use such as the remote islands where most vehicle commutes are well within the range of currently available EVs. SG should offer greater financial incentives for ownership and use than are currently available. Greater levels of electrification of our transport must be supported if Scotland is to realise its renewables potential and be serious about decarbonising the economy.

15. Where are the priorities for targeted improvements to our transport networks?

Are there other nationally significant priorities for investment in transport within and between cities?

As well as prioritising links within and between cities, what national priorities should NPF3 identify to improve physical and digital connections for rural areas?

Fixed links within the Scottish island groups could negate the need for carbon intensive internal ferry services and could be made viable by the installation of marine renewable devices within them. Win win solutions such as these can only be made possible if grid connecting Scotland's richest renewable resource areas is made a much greater priority than it is at present.

16. How can NPF3 improve our connections with the rest of the world?

Should the Grangemouth Investment Zone, Aberdeen Harbour and new freight capacity on the Forth be designated as national developments?

Should Hunterston and Scapa Flow be viewed as longer-term aspirations, or should they retain national development status?

Do you agree that the aspirations for growth of key airports identified in NPF2 should remain a national developments and be expanded to include Inverness, and broadened to reflect their role as hubs for economic development?

Should the proposed High Speed Rail connection to London be retained as a national development? Should it be expanded to include a high speed rail line between Edinburgh and Glasgow?

Alternatively, should High Speed Rail be removed as a national development and instead supported as a part of the longer-term spatial strategy?

Scapa Flow should retain national development status as a key deep water port resource to serve both the energy and transport sectors.

Inverness airport expansion should be included as a national development due to its key strategic location as a gateway port to the highlands and islands. Road improvements including those to the A9 both north and south of Inverness should be national developments to ensure improved connectivity to the north of Scotland's strategically important renewables resource.

Strategic Environmental Assessment – Environmental Report

1. What do you think of the environmental baseline information referred to in the Environmental Report? Are you aware of further information that could be used to inform the assessment findings?
2. Do you agree with the assessment findings? Are there other environmental effects arising from the Main Issues Report and Draft SPP?
3. Taking into account the environmental effects set out in the report, what are your views on:
 - a) The overall approach to NPF3, as outlined in the Main Issues Report, including key strategy proposals.

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- b) The strategic alternatives, as highlighted in the questions in the Main Issues Report?
 - c) The proposed suite of national developments to be included in the Proposed Framework?
 - d) Alternative candidate national developments?
 - e) The policies proposed for the Draft SPP?
 - f) The key questions for consultees set out in the Draft SPP?
4. What are the most significant negative effects arising from the assessment that should be taken into account as the NPF and SPP are finalised?
 5. How can the NPF and SPP be enhanced, to maximise their positive environmental effects?
 6. What do you think of the proposed approach to mitigation and monitoring proposed in Section 6?

No comments to make.

Equality Impact Assessment (EqIA)

In relation to the Equality Impact Assessment, please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people.

In relation to the Equality Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

No comments to make.

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Business and Regulatory Impact Assessment (BRIA)

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you feel the proposals in this consultation document may have on business.

No comments to make.