Local Government and Communities Committee

The Draft Climate Change Plan (RPP3)

Submission from Brookfield Renewable UK Limited

Introduction and context

Brookfield Renewable UK Limited welcomes the opportunity to respond to the Local Government and Communities Committee Call for Evidence on the recently published Draft Climate Change Plan. We would further welcome any opportunity to brief the Committee in person on the issues we raise in this submission if the Committee considered it helpful.

As stipulated in the Call for Evidence specification, we will focus our remarks specifically on the planning aspects of the Draft Climate Change Plan.

We welcome the progress that has been made in decarbonising Scotland’s electricity supply and the commitment to meeting Scotland’s electricity needs wholly from renewable sources by 2030. As one of the largest developers actively investing in onshore wind in Scotland, we remain committed to sourcing sustainable, economically viable and efficient sites to support the Scottish Government in its emission reduction targets, working in partnership with local communities to ensure the benefits derived from each development have a material effect on the local economy.

As both the Draft Climate Change Plan and the Energy Strategy make clear, the continued success of onshore wind in Scotland will be crucial for meeting the target of full decarbonisation of the electricity supply by 2030 and for continuing to act as a major Scottish export, wealth creator and employer.1

As the Committee will be aware, the low wholesale price of electricity, the changing UK-wide subsidy framework and other industry challenges - such as finding new routes-to-market in a subsidy-free market pose significant challenges to the future of the industry in Scotland. The report undertaken by the Scottish Affairs Select Committee in 2016 outlines these issues in detail, and we have commented further in our submission to the Economy, Jobs and Fair Work Committee.2 We welcome and share the Scottish Government’s ambitions, as outlined in the Draft Climate Change Plan and Energy Strategy, to make Scotland the first country in the UK to facilitate commercial wind farm development without subsidy.

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1 ONS figures on the low carbon and renewable energy economy in the UK for 2014 show onshore wind accounted for £3.2 billion in turnover, with Scotland having 46% of UK employment.

2 https://www.publications.parliament.uk/pa/cm201617/cmselect/cmscotaf/83/8302.htm
In our view, the key policy response required in order to realise this significant ambition is to ensure the optimal regulatory environment is in place. As the Committee will be aware, the planning system plays a key role in appropriate, efficient and economically viable onshore wind development.

This is the context in which our submission, which draws on our experience of engaging with the local and national planning landscape, and recommendations for improvement are made.

**About Brookfield Renewable UK Limited**

Brookfield Renewable UK Limited is a subsidiary of Brookfield Renewable Partners, one of the largest publicly-traded, pure-play renewable power platforms globally. Brookfield Renewable’s power portfolio includes over 260 facilities totalling 10,700 MW of hydroelectric and wind capacity, and is diversified across 15 power markets in seven countries. The global operating platform employs over 2,000 people.

Brookfield Renewable is building a European platform to provide fully-integrated development, operating, construction and power marketing capabilities. Today, the platform has 600 MW of operating wind capacity across the UK, Ireland and Portugal, and a development pipeline of approximately 1,400 MW.

In Scotland, Brookfield Renewable has an office in Edinburgh with a growing team of specialist staff focused on the acquisition and development of suitable onshore wind energy sites throughout the UK. It currently has 150 MW of permitted capacity with a further 75 MW in planning.

**Planning**

In our view, the efficient and consistent application of the planning system, in both local and national contexts, is a critical component of the regulatory environment surrounding successful onshore wind development. Improvements to the coherency and consistency in application of local development plans in local decision-making, and permeance of national policy across all aspects of the planning system, will be important for the future success of the onshore wind industry in Scotland in a subsidy-free context.

We are aware of the Scottish Government’s current consultation on the Scottish Planning system, and intend to make a submission. However, for the purposes of the Committee’s consideration of the planning issues outlined in the Draft Climate Change Plan, there are a number of issues we feel are worthy of note when the Committee is deliberating Section 5.2 of the Plan, “The Planning System”.  

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However, from the outset we believe it is important to address an important and prominent misconception about the relationship between developers and local communities. In our experience, building strong relationships with local communities around our proposed sites is crucial to a successful two-way partnership between developers and local people.

Local communities play an important and significant role in the development process by providing feedback and shaping our proposed projects. We value the role the community plays in this regard, and welcome the Scottish Government’s intention to bolster it. Furthermore, we see first-hand the direct positive impact community benefit and ownership arrangements can have on local economies. The Community Liaison Groups we establish to inform each of our developments, which include representatives from local community councils and community associations, are a key part of the process from our pre-application consultation through to construction, commissioning and beyond.

As the Committee will be well aware, and as the Draft Climate Change Plan outlines, national planning policy, with specific reference to onshore wind farms, is outlined in a suite of documents, but principally the National Planning Framework (NPF), and Scottish Planning Policy (SPP).

Our experience of engaging with local and national planning systems for onshore wind development raises the following issues in relation the application of these policies and Section 5.2 of the Draft Climate Change Plan:

1. Coherency and consistency between local and national planning policy

As Section 5.2.4 of the Draft Climate Change Plan outlines, all local development plans must take account of the National Planning Framework, of which a core pillar is a commitment to a “Low Carbon Place.” As the Committee will be aware, the local development plan is the basis on which applications for wind farms are largely judged.

In our view, there is often disparity in the consistency with which, and the extent to which, local development plans are used in the assessment of wind farm applications. Our experience tells us that the contribution onshore wind development makes to cutting emissions, a key requirement in local development plans, is not given due weight in local planning processes that national policy suggests it should. Furthermore, this situation is sometimes applicable to both the assessment of different applications in the same area, and the differences in approach and application across different geographic areas.

We believe that there should be greater consistency in the drafting of local development plans and in the subsequent assessment of wind farm applications,
and mechanisms should be established to ensure that national planning priorities, such as “Low Carbon Place”, are sufficiently accounted for in local decision making.

2. The presumption in favour of development that contributes to sustainable development

Section 5.2.5 of the Draft Climate Change Plan outlines that there is a presumption in favour of development that contributes to sustainable development. Our experience suggests that this is often not the case, and whilst there may be a presumption in favour of proposals that contribute to sustainable development, in many instances this does not extend to wind farm developments.

It is fundamentally in our interests, and in the interests of other developers in the market, to bring forward proposals that are appropriately sited, scaled, and carry the support of the community in good faith. Ultimately for all wind farm developments, the process of assessment in local decision making requires a consideration of all relevant factors in the overall planning balance to allow a decision on what is acceptable.

However, in some cases we do not feel that the consideration of our applications is taking place in the context of a presumption in favour of sustainable development. It is, as the Draft Climate Change Plan acknowledges, an important consideration, and one that should attract significant weight in balancing of relevant factors in the determination of wind farm applications. In our view, we believe that further steps should be taken to ensure this presumption features more heavily, where projects on balance, meet other relevant material considerations.

This would further conform with the ‘Policy Principle’ in SPP Paragraph 27 which states:\textsuperscript{4}

\textit{“This SPP introduces a presumption in favour of development that contributes to sustainable development”}.

3. Local Strategic Planning

Section 5.2.5 also supports a principle of strategic planning for wind farm locations. This principle is outlined in paragraph 161 of Scottish Planning Policy (SPP). SPP, paragraph 161, provides details for Planning Authorities with regards to the preparation of spatial frameworks for onshore wind development, and makes it clear that proposals for onshore wind turbine development should continue to be determined whilst spatial frameworks and local policies are being prepared and updated. SPP is very clear and in our view correct, in having a focus on protecting

\textsuperscript{4} http://www.gov.scot/Publications/2014/06/5823
National Parks and National Scenic Areas. Wind Farms are generally guided to ‘Group 3’ areas.

 Whilst many Local Authorities will compile “areas of search” for wind farm development, there are often a number of additional layers of protection and sensitivities added by a Local Authority to those “Areas of Protection” included in SPP. This is in direct conflict with the explicit requirement of paragraph 163 that this should not be the approach. In addition, “areas of search” often do not reflect current turbine technologies and scale, and do not provide scope for consideration of other relevant factors such as economic and commercial viability – a very necessary consideration if the Scottish Government wishes to realise its ambition of subsidy-free development.

 As the onshore wind industry develops, there are naturally fewer sites that are economically viable in a subsidy free context that will fall within Group 3 “Areas with potential for wind farm development.” As such, our view is that it will be necessary for the Government to consider the real implication of projects being assessed in a negative manner due to local strategic planning approaches.

 Accepting a more clear ‘plan-led’ approach at a local level, which is consistent with SPP, will be crucial in taking forward commercially viable wind farm developments.

 Conclusion and recommendations

 In conclusion, we are grateful for the opportunity to provide the Committee with evidence, and would welcome the opportunity to discuss these issues in more detail. We welcome the Scottish Government’s strongly stated ambition for subsidy-free onshore wind in Scotland, and the progress that has been made in decarbonising the electricity supply.

 It is our view that in order to realise this ambition, the regulatory environment surrounding the industry needs to be conducive to further development, which includes the planning system. We believe improvements in the issues raised above could have a significant positive impact in reducing barriers to investment and the significant resource implications of all those engaging with the system – an important consideration when trying to achieve commercial viability without subsidy. We would be grateful for the Committee’s consideration of these issues as part of its scrutiny of the planning aspects of the Draft Climate Change Plan.

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