



Scottish Borders Council  
Planning, Policy & Access Team

**By email to: [localplan@scotborders.gov.uk](mailto:localplan@scotborders.gov.uk)**

31 January 2019

Dear Sir / Madam,

**SCOTTISH BORDERS COUNCIL LOCAL DEVELOPMENT PLAN 2 (LDP2):  
CONSULTATION ON MAIN ISSUES REPORT**

ScottishPower Renewables is part of the Iberdrola Group, a world leader in clean energy with an installed capacity of over 29,000 MW, and the leading wind energy producer worldwide.

ScottishPower Renewables is helping to drive the Iberdrola Group's ambition of being the Utility of the Future and is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation. Our ambitious growth plans include offshore windfarms in East Anglia with our team leading the Group's international offshore development.

With over 40 operational windfarms, we manage all of our sites through our innovative and world leading Control Centre at Whitelee Windfarm.

Our operational onshore windfarm portfolio has now delivered over £25 million in community benefits to those neighbouring our windfarms in Scotland, and continues to deliver significant employment and economic benefits, locally and nationally. We have repowered two of our operational windfarms to date, and anticipate a programme of repowering into the future, as we strive to incorporate the most efficient and cost-effective technologies into existing sites, thereby delivering clean, green energy at the lowest cost to consumers, whilst minimising environmental impacts.

We welcome the opportunity to respond to the consultation at the Main Issue Report (MIR) stage and I hope you find our response helpful in developing the proposed LDP2. Our focus is on the sections of the MIR which are relevant to the promotion of sustainable low carbon development, namely renewable energy developments.

The Scottish Government's Energy Strategy states that around 17GW of total installed renewable electricity capacity will be required in 2030 to meet Scotland's decarbonisation targets. As noted in the Onshore Wind Policy Statement, ensuring that a large proportion of existing onshore wind farms are repowered and optimised to yield as much of the available wind resource as possible will be a key part of delivering these ambitions. We would therefore ask that this is a key consideration in the development of the proposed LDP2.

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As well as continued support for new onshore wind projects, there is also a need to encourage more efficient use of existing wind farm schemes. This may include blade extensions, modifications to wind turbines, as well as the repowering of sites with larger turbines, with a view to increasing their efficiency, with the promotion of compatible uses such as solar and energy storage. We would therefore ask that the proposed LDP2 reflects this and sets out how these objectives should be supported, and the clear benefits of doing so, in line with Scottish Government policy aspirations.

We welcome references within the MIR report for the potential for new stand-alone solar projects within the council area and would ask that the LDP2 also considers the potential for stand-alone energy storage proposals. Any technology which supports the ambition to move to a low carbon energy system should be supported as a guiding principle within local development planning.

I hope the comments provided are helpful and please feel free to contact me on [REDACTED] should you require any additional information.

Yours faithfully,

[REDACTED]

## **SPR COMMENTS ON THE MAIN ISSUES REPORT**

### **Delivering Sustainability and Climate Change Agenda**

SPR welcome the reference to Scottish Government Climate Change Plan (2018) and the Climate Change (Scotland) Act 2009 within the MIR, making reference to how the Scottish Government intends to meet the emission reduction targets in the period 2018-2032.

The Scottish Government has also announced, as part of A Plan for Scotland: The Scottish Government's Programme For Scotland 2016-17, that it will bring forward a new Climate Change Bill, including an ambitious new 2020 target of reducing actual Scottish emissions by more than 50%. The proposed LDP2 and any supporting supplementary guidance should also make reference to this, and seek to promote and support the measures outlined to achieve Scottish Government's targets.

Also welcomed is the reference within the MIR to the Scottish Government Energy Strategy (2017). As mentioned above, the Scottish Government's Energy Strategy states that around 17GW of total installed renewable electricity capacity will be required in 2030 to meet Scotland's decarbonisation targets. Furthermore, the Scottish Government Onshore Wind Policy Statement, sets out that ensuring that a large proportion of existing onshore wind farms are repowered and optimised to yield as much of the available wind resource as possible will be a key part of delivering these ambitions. In addition to this, there will clearly be a need to also support new renewable developments, including new onshore windfarm sites, if these targets are to be realised. Given the clear policy intention at national policy level, it is vital that the Scottish Borders LPD2 translates this into policy at a local level.

#### **Main Issues: Sustainability and Climate Change.**

Section 7.18 of the consultation document notes that the Council will continue to support proposals for major windfarm proposals in appropriate locations, which is welcome. We note that the Council's Supplementary Guidance on Renewable Energy, which contains guidance on the appropriate siting of wind energy proposals, was published in 2018, however this is based on Landscape Capacity Study conducted in 2016.

With this in mind we welcome the acknowledgement within the MIR that in order to increase efficiency of proposals, larger turbines will be required, however we have some reservations about the use of strategic landscape capacity studies in case-by-case decision-making for specific project proposals. It is important to note the limitations of such studies and Scottish Natural Heritage (SNH) have published a 'toolkit' on landscape capacity studies, which highlights that such studies cannot "*define the precise limit of development which can be accommodated within a given landscape*", although they can "*give an indication of the capacity, or ability, of the landscape to accommodate change*".

We would therefore ask that the limitations of such studies are reflected within the development of the proposed LDP2 to ensure that projects continue to be assessed on a case-by-case basis cognisant of Scottish Government's wider policy ambitions for renewable energy.

#### **Preferred Options: Sustainability and Climate Change**

SPR welcome recognition within the Preferred Options set out in the MIR that the Council should continue to promote and support sustainability and climate change adaption and that LDP2 policies and proposals should ensure they promote development in the interests of sustainable development and climate change.

Further to this, we believe that the LDP2 policies should also include, in light of the above Scottish Government position, a clear focus on the further development of renewable technologies, including onshore wind, with a focus on repowering, and any such associated proposal which achieves the optimisation of a renewable site, such as colocation of compatible technologies, the move towards the use of taller turbine technology, and include support for any other associated development which supports the reconfiguration of our energy system with view to achieving a low carbon future. Policy support for new and repowered onshore wind, in addition to solar and energy storage is essential if the Scottish Government's low carbon economy objectives, and the targets set out in the Scottish Energy Strategy are to be realised.

**ScottishPower Renewables  
January 2019**