

<b>Issue 16</b>	<b>Delivering Heat and Electricity</b>	
<b>Development plan reference:</b>	Section 7 City Region as a Low Carbon Place - Delivering Heat and Electricity	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Banks Group (PP12)  SEPA (Scottish Environment Protection Agency) (PP23)  North Ayrshire Council (PP32)  Councillor Martha Wardrop (PP37_03)  Scottish Government (PP57_11)</p>		
<b>Provision of the development plan to which the issue relates:</b>		
<p>Delivering Heat and Electricity (pages 66-68)  Policy 10 Delivering Heat and Electricity (page 68)</p>		
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Banks Group (PP12)</u></p> <p>Support is sought for a range of renewable technologies within the Proposed Plan including within Policy 10, Delivering Heat and Electricity. Welcome support stated within Background Report 10 Low and Zero Carbon Generating Technologies <b>(RSD21)</b> and suggest changes within the Proposed Plan to reflect the Background Report.</p> <p>Consider that the recognised need and support for a range of renewable energy technologies should be clearly set out in the Plan.</p> <p>No mention of generation, storage, transmission or distribution networks in Policy 10, Delivering Heat and Electricity of the Proposed Plan and suggest an amendment to Policy 10 to clearly express Clydeplan's support for strategic energy infrastructure.</p> <p><u>SEPA (PP23)</u></p> <p>The emphasis on biomass as a renewable fuel source associated with some elements of the plan may exacerbate existing localised air quality problems and this is an issue which may benefit from further consideration.</p> <p><u>North Ayrshire Council (PP32)</u></p> <p>Clydeplan should recognise Hunterston's nationally significant status within NPF3 as an 'Energy Hub' <b>(RSD02)</b> including being an important landfall for strategic grid connections, which would support Government's expectations that development plans should promote a positive, planning approach to providing low carbon</p>		

infrastructure across Scotland.

Councillor Martha Wardrop (PP37 03)

In relation to Paragraph 7.4 (page 66) the following statement is weak: “The use of low and zero carbon generating technologies is encouraged where appropriate.”

Scottish Government (PP57 11)

Policy 10, Delivering Heat and Electricity (page 68), Suggest inserting a statement that identifies supplementary guidance will be prepared to address cross boundary issues for strategic heat infrastructure. A resolution to the data access issue is expected and including such a statement will allow for future work to be progressed and will provide the status of the development plan in decision making, reflecting the significance Ministers attach to this policy area.

**Modifications sought by those submitting representations:**

Banks Group (PP12)

In Policy 10 ‘Delivering Heat and Electricity’ first sentence replace the word “consideration” with “support” (page 68).

The recognised need and support for a range of renewable energy technologies should be clearly set out in the Plan.

SEPA (PP23)

Further consideration could be given to the issue of emphasising biomass as a renewable fuel source associated with some elements of the Plan as it may exacerbate existing localised air quality problems.

North Ayrshire Council (PP32)

The Proposed Plan should recognise that Hunterston's nationally significant status within National Planning Framework 3 as an 'Energy Hub' supporting the city region's transition to a low carbon future and providing an important landfall for strategic grid connections.

Councillor Martha Wardrop (PP37 03)

Strengthen the statement “The use of low and zero carbon generating technologies is encouraged where appropriate” in Paragraph 7.4 (page 66).

Scottish Government (PP57 11)

Amend Policy 10, Delivering Heat and Electricity (page 68) to include a statement to the effect that supplementary guidance will be prepared to address cross boundary issues for strategic heat infrastructure.

## Summary of responses (including reasons) by Planning Authority:

### Banks Group (PP12)

Clydeplan does not accept the modification as it considers the overarching strategic priority of supporting the transition to the low carbon economy is satisfactorily expressed in Policy 10 Delivering Heat and Electricity. The degree of support offered in the Plan for renewable technologies is strategic in nature. However, the delivery of policy support is applied at local and project level where relevant local issues are duly taken into account and assessed. Accordingly, the considered wording of Policy 10 is deliberately prudent, offering measured support at the strategic level to enable fuller consideration of the appropriateness of specific projects and technologies within local contexts.

### SEPA (PP23)

Clydeplan does not accept the modification as it considers that this issue is more appropriately addressed within the content of Section 6 Biomass of Background Report 10 Low and Zero Carbon Generating Technologies, paragraphs 6.4-6.5 **(ASD31)**.

### North Ayrshire Council (PP32)

Clydeplan does not accept the modification as it considers that the role of Hunterston, as it is located outwith the Plan area, is a matter for North Ayrshire Council

### Councillor Martha Wardrop (PP37 03)

Clydeplan does not accept the modification as it considers the statement in Paragraph 7.4 (page 66) adequately reflects that the Plan supports a strategic shift to low carbon generating technologies. Whilst the extent of this shift is strategic in nature, the solution will be applied at local level where relevant local issues must be duly considered and assessed. It is considered prudent to offer measured support at the strategic level.

### The Scottish Government (PP57 11)

Clydeplan does not accept the modification as it considers that the Plan deals with heat in the only manner currently available to strategic development planning authorities. Clydeplan notes the intention of the modification sought in relation to Policy 10, Delivering Heat and Electricity (page 68) requesting that Clydeplan prepare supplementary guidance on cross boundary issues for strategic heat infrastructure in order to reflect the significance Ministers attach to this policy area. Clydeplan also notes the Scottish Government's comment in relation to its expectation of a resolution to ongoing data access issues.

The Scottish Government suggests that in order to address the cross boundary issues for strategic heat infrastructure, Clydeplan should undertake a heat mapping exercise as part of the proposed supplementary guidance. Whilst Clydeplan is

supportive of the need to progress heat maps and encourage a consistent approach to the heat map process its eight constituent local authorities, Clydeplan cannot at present legally access and analyse the heat map data available in Scotland's Heat Plan. Therefore, Clydeplan cannot, at this stage, commit to delivering effective supplementary guidance based on the fullest information available i.e. Scotland's Heat Plan, to assess cross-boundary issues as requested.

The Scottish Government has previously indicated that a resolution to the data access issue will allow for future work to be progressed. The Reporter should be aware that at the time of writing, no resolution has been forthcoming. Consequently, Clydeplan does not accept the modification to Policy 10 (page 68). It is considered to be a premature request given the lack of resolution to access relevant data and an inability of the Planning Authority to judge the scale of the task involved in producing city region-wide guidance on this issue.

Clydeplan will progress heat and electricity issues within the context of the Plan's Action Programme through a process of collaborative working with the eight local authorities and wider stakeholders and this activity will inform the policy responses within the Local Development Plans and Development Management decisions . It is anticipated that an event will be held in summer/autumn 2016 to launch this work.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]