
**LIS RESPONSE TO INQUIRY INTO THE SCOTTISH GOVERNMENT'S RENEWABLE ENERGY
TARGETS
SUBMITTED TO THE SCOTTISH GOVERNMENT – 28.02.2012**

Introduction

The Landscape Institute (LI) is the chartered institute in the United Kingdom for landscape architects, incorporating designers, managers, and scientists, concerned with conserving and enhancing the environment.

The LI is an educational charity and chartered body whose purpose is to protect, conserve and enhance the natural and built environment for the benefit of the public. The LI is committed to the principles of sustainable development by improving the quality of design of urban and rural environments and to the protection and enhancement of our physical and natural environments.

The Li's Scottish Branch (LIS) represents the professional membership within Scotland and is particularly concerned with design, management and planning for the protection, conservation and enhancement of the natural and built environment of Scotland.

Many members have experience of providing landscape advice to developers, local authorities and statutory consultees on site selection, siting, design, landscape and visual impact assessment, construction and research into the as built effects for both onshore and offshore renewable energy projects. Members work in the public sector; private sector and the voluntary sector LIS welcomes the opportunity to respond to the Committee's Inquiry into the Scottish Government's Renewable Energy Targets.

Context

On November 21, 2006 the UK government announced that it had ratified the Council of Europe's European Landscape Convention (ELC). The Convention's aims are to promote protection, management and planning of all landscapes, including natural, managed, urban and pen-urban areas, and special, every day and also degraded landscape. It aims to organise European co-operation on landscape issues.

LIS has signed the Scottish Landscape Charter (October 2010) which identifies the importance of Scotland's landscapes and sets out principles that should guide further action in support of maintaining the quality and distinctiveness of Scottish landscapes.

The National Planning Framework for Scotland (2 2009) recognises that Scotland's landscapes are a national asset of the highest value, acknowledging the protection given to National Scenic Areas, as well as the sensitivity of other areas such as remote mountain and coastal areas, where great care is needed to safeguard wild land character.

Landscape Institute Position in Renewable

Within this context, LIS recognises the challenge to balance landscape protection with management of landscape change and the need to direct such change to the most appropriate places whilst achieving the highest standards of design in implementation. The Landscape Institute has produced its own Position Statement on climate change (2008) which states: “The Landscape Institute is fully committed to the maximisation of renewable energy capacity as an essential aspect of climate change mitigation whilst ensuring the robust protection and enhancement of landscape character and condition”.

Response to Call for Written Evidence

Overview

The remit for the Inquiry opens by asking what “risks and barriers” exist that may affect the Government’s ability to reach its targets. However, nowhere in the paper is the risk to the Scottish landscape and seascape identified. Existing wind farm development which contributes towards the targets has already resulted in significant change to some of Scotland’s landscapes, including some protected landscapes, as a consequence of the extensive influence of onshore wind turbines on landscape character and on people’s visual amenity. This trend is set to continue in the light of increasing targets.

It is accepted that there are sound environmental drivers behind the targets to address the challenges of Climate Change. However, caution must be applied to the way in which targets are being achieved to avoid wind farms becoming ubiquitously visible throughout the Scottish landscape and seascape, and by implication, within or from protected landscapes such as National Scenic Areas,

National Parks or Search Areas for Wild Land. To address this concern, LIS suggests action must be taken by government to provide clear, unequivocal direction to renewable energy developers and planners/decision makers as to how, and importantly where, the targets could be met in the form of a National Framework for Renewable Energy.

To date there has been a pattern of onshore wind energy development which is quite concentrated and relatively contained, largely driven by access, grid connection and avoidance of designated areas. However, the pattern is changing rapidly, with a considerable increase in applications which may result in more extensive landscape and visual impacts, including impacts on nationally designated landscapes. Additionally, there has been a rapid growth in the number of small-scale developments and single turbines benefiting from the Feed-in-Tariff (FIT).

Is the planning system adequately resourced and fit for purpose?

Currently, there is a serious lack of trained landscape professionals, particularly those with understanding of renewable energy and its implications, within some planning authorities. As a consequence, in some authorities, recommendations for major planning decisions are being made by planning officers with no advice from a chartered Landscape Architect. LIS considers that this is a major shortcoming in the planning system which requires to be addressed in order to properly inform decision making in relation to renewable development.

As the Government's advisor on landscape, SNH, provides landscape advice in respect of wind farm applications. SNH has produced valuable guidance in respect of Siting and Designing Windfarms in the Landscape (2009), as well as Cumulative Effects guidance (2005 and due to be updated imminently). Some local Authorities have also prepared Supplementary Planning Guidance which has been informed by landscape studies. However, LIS member's experience is that SNH and the local authorities find it increasingly difficult to deal with the volume of wind farm applications. SNH has had to decline responding in respect of small scale, individual turbine applications and struggles to provide robust and consistent advice on individual applications which reflects the principles set out in published guidance. Members consider that this is sometimes due to lack of resource and sometimes, inconsistent or unclear advice being provided. Clear direction from SNH and the local authorities within the context of a Government led National Framework for Renewable Energy Development, provided at an early stage in any proposed development would enable the renewable energy targets to be met without avoidable and undesirable adverse effects on Scotland's valued landscape. This would prevent inappropriate projects from being progressed with related mis-spent resources for all concerned. In the current circumstances, SNH's stance of 'no objection' unless the proposed development is a threat to national interest is not considered to be helpful to planning authorities, developers or consultants. The consequence is a lack of clarity as to SNH's view and the strength of any 'concerns' they may express in their consultation responses.

There is a lack of any strategic overview of the pattern of development and in particular, the cumulative effects of medium to large scale, 'commercial' wind farms with the rapid increase in single turbines developed as FIT schemes. These single turbine developments are often of different size and type (e.g. 2 bladed, small 'domestic' single turbines and larger 3 bladed turbines of between 50m and 80m), although occurring close to each other. The inter-relationships of single turbines with each other and with larger scale commercial wind farms can have adverse impacts on the landscape as well as affect public attitudes to the renewable energy sector. The fact that SNH is not consulted on these schemes means that there is very limited, if any, landscape consideration given to them, because there is not sufficient resource within the local authorities. Currently, the majority of local authorities do not keep any co-ordinated data base of operational, consented or application stage single turbine developments. Consequently, there is no means of considering the effects of these developments on the rural landscape, either cumulatively with each other, or in conjunction with medium or large-scale wind farms, through the planning process.

Summary

- The determining planning authorities are currently not adequately resourced in terms of advice from experienced landscape professionals.
- There is a need to monitor change to the landscape resulting from renewable energy developments: constructed, consented and in the application process.
- Government requires strong landscape advice as input to a National Framework for Renewable Energy Development that will assist in developing and implementing its spatial plans to achieve the renewable energy targets.

- SNH as the government's advisor, and the local authorities, need a sufficient, skilled and available landscape resource to provide robust and consistent guidance reflecting the National Framework.
- LIS considers that there are other areas outside nationally designated areas that nevertheless contribute to the significance of the Scottish landscape, its cultural associations and its economic uses, such as tourism. Thus, a National Framework must consider the Scottish landscape as a whole, acknowledging its rich diversity of character, rather than only considering nationally designated areas. The result would be clearly identified areas of Scotland which should be protected and also those areas to which onshore wind renewable energy development should be directed and their capacity to contribute to the achievement of the targets in an efficient and effective way.

How can national priorities be reconciled with local interests?

The implication of this question is that there is a conflict between national priorities and local interests, the assumption being that the renewable energy targets reflect a national priority the consequences of which are resisted at the local level.

The Scottish landscape is also a national priority and is protected at a national level through National Parks and National Scenic Areas. The challenge is to balance achievement of the renewable energy targets with protection of these national assets. This means that policy and tests should be strengthened to protect nationally designated landscapes.

Strong guidance is needed from government, or SNH on its behalf, setting out a National Framework for Renewable Energy Development which identifies these spatially defined areas (i.e. currently protected and those that should be protected from wind farm development) at a national level. This would assist in providing more clarity to the web-based guidance hierarchy which replaces PAN 45. It would also assist in focusing the debate between national and local interests in the planning process.

The recent publication of renewable energy SPGs in response to SPP, highlights the considerable tension between national renewable energy targets and local interests, with most local authorities identifying very limited and restrictive 'areas of search'. In some instances, these publications demonstrate a lack of training and knowledge about landscape, (including a lack of understanding in managing and planning for landscape change) suggesting under representation of the landscape profession in key policy making.

One consequence of the tension between national renewable energy targets and local interests, is a considerable waste of time, effort and money by developers and local authorities alike in 'fighting out' where development should take place. Clear direction at a national level would create a greater degree of certainty to developers and would enable more efficient and effective achievement of the targets.

Improvement in decision making around national priorities versus local accountability would be assisted by stronger, more innovative pre-application engagement processes. LIS recognises the need to promote better, more responsive models for community and stakeholder engagement and recommends that 'best practice' examples within the sector should be identified and disseminated.

Summary

- Nationally designated landscapes should be regarded as a national priority which require robust national protection.
- There is an urgent need for the planning system, informed by skilled chartered landscape practitioners, to address the imminent risk that proliferation of small-scale local turbines will act to constrain more strategic developments that better conform to national policy and achievement of the renewable targets, by sterilising development areas and/or having a negative effect on public opinion. This can best be dealt with by stronger national guidance from government and/or the local authorities in respect of siting and design of small-scale developments and the way in which these should integrate with medium to larger scale development in order to plan for meeting the targets.
- Landscape character can be protected and enhanced by sound planning and design guidance, but this needs to be informed and enforced by trained professional Landscape Architects.

Conclusion

In conclusion, LIS acknowledges that onshore and offshore renewable technologies, including wind farms, will form significantly more conspicuous elements in the Scottish landscape and our surrounding seascape between now and 2050. Clear government guidance, high quality planning and design, effective public engagement and sound environmental management will be increasingly important in shaping public opinion around the consequential changes to the Scottish landscape and seascape.

LIS recommends that a National Framework for Renewable Energy Development be prepared by government, which incorporates professional landscape advice. This would have the following benefits:

- National priorities can be better reconciled with local interests by the establishment of a National Framework for Renewable Energy Development which is subject to open public consultation, identifying the rationale behind the targets as well as identifying how and where these can be achieved;
- A National Framework which includes spatial guidance would provide stronger national direction and would assist in protecting nationally valued landscapes as well as delivering the targets with less wasted resource (some unhelpful SPG being prepared, inappropriate sites being taken forwards); and
- A National Framework would also provide a vehicle for managing local expectations.

LIS is supportive of renewable energy as an essential aspect of climate change mitigation and believes it and its members have a key role in bringing specialist professional skills to the assessment, evaluation, communication and consideration of landscape change.