

UK General/Planning

John McNairney
Chief Planner
The Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

ABO Wind UK Limited
1 Houstoun Interchange
Livingston
EH54 5DW

Phone: 0800 066 5631
Contact Person: Duncan Scott

Mail to: chief.planner@gov.scot

20th May 2016

Dear Mr McNairney,

Consultation on Draft Advice on Net Economic Benefit and Planning

We have pleasure in responding to the consultation on the draft advice on net economic benefit and planning.

ABO Wind is one of Europe's most experienced wind energy developers. ABO Wind now has interests in the United Kingdom, Ireland, Germany, France, Spain, Finland and Argentina. ABO Wind has successfully been developing, constructing, operating and maintaining wind farms for almost two decades and to date has connected 500 wind turbines generating more than 1,000MW.

Our team has expertise covering all phases of wind farm development, from site selection and land acquisition to assessing the specific wind yield for a project, technical wind farm design, planning and environmental impact assessment, bank financing, wind farm construction and operational maintenance.

We have been operating in the UK since 2006 and have two offices, located in Livingston and Inverness. ABO Wind UK's first operational wind farm is a three turbine development at Lairg, Sutherland which has been operational since January 2012. This is located on the common grazings of the Lairg Estate and includes a sizable crofting involvement in the project. We currently have two onshore wind farm planning applications live in the Scottish planning system and hope to submit further applications in 2016/17 subject to clarification of the UK Government's intentions to re-introduce a market stabilisation mechanism providing a viable route to market for onshore wind energy.

Directors: Dr. Jochen Ahn, Matthias Bockholt, Andreas Höllinger

Bank Account: HSBC PLC, Acc No: 32128098, Sort Code: 40-20-44 **IBAN:** GB04 BOFI 8391 1275 1761 74
VAT Registration No: 100 1656 75- A company registered in Scotland No SC 314110 whose registered office is
1 Houstoun Interchange, Livingston, EH54 5DW · uk@abo-wind.com · www.abo-wind.com

Our consultation response is confined to our business interests in onshore wind energy development.

We support the overall goal set out at para 1 of the draft advice, as well as the context of economic benefit in the decision making process alongside the guiding principles of sustainability (para 2).

While we welcome the opportunity for net economic benefits to be treated as a material consideration in the planning decision-making process, we believe that it is essential to restate that where a proposal complies with the development plan, it should not be necessary for the applicant to demonstrate that the proposal creates net economic benefit (para 3). Indeed, development such as renewable energy development, which has both a clear need and established deployment targets set in Government policy, it will not usually be necessary to also make an argument regarding the economic benefit of a proposed renewable energy development, in the same way as stated for housing development (para 4).

Thus, we generally support the premise that the advice is likely to be relevant in assessing the impact of applications that are contrary to the development plan or where other material considerations indicate that the decision on whether to grant planning consent is finely balanced. However, we would wish to see the Scottish Government adopt a more explicit policy position of a clear presumption in favour of sustainable development such that wind energy projects, carefully sited and designed, are not continually determined by planning authorities to be contrary to the development plan on landscape and visual grounds regardless of the inherent climate change benefits as well as the need and government targets for renewable energy development. Nonetheless, we would welcome the opportunity to demonstrate the net economic benefits of our wind energy projects where a decision on whether to grant planning consent is genuinely finely balanced.

Recognising that it is the planning authority who will evaluate the assessment of net economic benefit provided by the applicant (para 12) we would have expected to see some clear practical advice for planning authorities as to how to undertake such evaluations in a transparent and consistent manner across Scotland. The generalised advice in paras 13-27 does not contribute much to that requirement, and does not appear to be in line with the statements at paras 28-29 regarding the need for proportionality within the guiding principles of streamlining planning assessments.

Finally we wish to express concern at the example scenario for onshore renewable energy ('example 6'). ABO Wind is supportive of the principle of shared ownership and we have submitted our views to Local Energy Scotland's consultation on draft policy on shared ownership. In this we have raised our particular concern in relation to the interest and capacity of communities to engage in such a formalised, strategic manner with a developer at an early stage in the planning process. Expectations for named community groups interested in engaging with developers pre-determination on shared ownership to be representative of the community as a whole, to be able to develop a community

regeneration strategy and be capable of directly employing a development officer to deliver the net economic benefits of the shared ownership are unrealistic. The example as it stands also risks the formation of unrealistic expectations in planning authorities as to what the Scottish Government believes to constitute a 'standard' benchmark for net economic benefit in onshore renewable projects in the planning system.

We trust this is a helpful contribution to the consultation.

Yours sincerely,

Duncan Scott MRTPI MCIWEN CEnv
Head of Planning
ABO Wind UK Ltd