

Shields M (Melissa)

From: Bryceland, Lynne
Sent: 20 May 2016 16:24
To: Chief Planner
Cc: Tejedor Escobar, Emilio
Subject: Draft Advice on Net Economic Benefit and Planning

Please find below further comments from ScottishPower on the Draft Advice on Net Economic Benefit and Planning.

ScottishPower (representing our renewable, generation and networks businesses) welcomes the opportunity to comment further on this guidance. It is interesting to see the guidance develop. We are generally content with the main themes within the guidance and would like to make the following comments for your consideration:

- We welcome this guidance as important in seeking to give further weight within the planning process to net economic gain.
- The guidance as drafted is high-level, simple and easy to read, and necessarily applicable to many different types of land uses and development scales.
- We do recognise, however, the challenges in being able to accurately predict the potential net economic gain of any particular development. As such, the guidance does not recognise the full range of potential socio-economic benefits from energy developments. We do acknowledge that these can be considered in more detail on a site by site basis through the consenting process, provided that this guidance leads developers and authorities to do so.
- In **paras 14-16** – Defining the area for assessing impact – the guidance talks about where necessary narrowing or extending the net area for assessing the impact of developments. We suggest that it would also be valuable to assess national and UK wide impacts, where appropriate, on significant projects such as energy.
- In **para 17**, We welcome the principle that “the period over which costs and benefits are assessed should usually cover the lifetime of the project”.
- In **para 23** – Wider social and environmental impacts – we would suggest that the concept of ‘Natural Capital’ is introduced into the guidance as a valuable way of measuring the impact on our natural environment from planned developments.
- **Para 24** – Risk and Uncertainty – we would like to draw attention to the proposal to quantify the risks and associated outcomes, where the level of risk is expected to be high. In practice, this is likely to be very difficult to achieve given commercial sensitivities particularly for projects in the planning stages where works have yet to be procured.
- We welcome specific inclusion of the illustration in **Example 6** of shared ownership on onshore renewables as a material consideration within the planning system. It should however be noted that the detail of any offer of shared ownership which can be decided pre-planning will be very limited, in-principle only, and no decisions about the detail of any shared ownership agreements could be made until a much later stage. It is therefore difficult to identify ‘meaningful’ offers of shared ownership at an early stage. Further, projects where an offer of shared ownership is not possible, for a variety of reasons including lack of community appetite, should not be disadvantaged in a planning system which gives weight to shared ownership offers. We are working closely with the Scottish Government, Local Energy Scotland and others to develop our collective understanding of how to implement community investment in onshore wind projects, so this guidance should note the ongoing nature of these discussions.

As ever, my colleagues and I would be happy to discuss any of our comments in more detail.

Best wishes

Lynne



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