

**Archived:** 01 February 2021 13:29:05

**From:** [REDACTED]

**Sent:** Mon, 25 Jan 2021 16:59:22 +0000ARC

**To:**

**Subject:** Belltown Power response to Scottish Borders Proposed LDP

**Sensitivity:** Normal

[REDACTED]

---

**CAUTION:** External Email

Please find attached a response from Belltown Power to the Scottish Borders proposed Local Development Plan.

Thanks

Regards

[REDACTED]  
[REDACTED]  
Belltown Power UK Limited  
Hanover House  
47 Corn Street  
Bristol BS1 1HT

---

The information contained in this email and any attachments is confidential. If you have received it in error please notify us immediately by reply and do not disclose it further. Unless expressly stated otherwise, such information is not provided as financial, investment, or legal advice and we recommend seeking independent professional advice on any such matters. The sender of this email is part of the Belltown Power group, the parent of which, Belltown Power UK Limited, is a limited company registered in England and Wales with registered number 09677724. Our registered office is at Second Floor, Hanover House, 47 Corn Street, Bristol BS1 1HT.



# BELLTOWNPOWER

47 Corn St, Bristol BS1 1HT  
(+44) (0)117 303 5217

22<sup>nd</sup> January 2021

## **Belltown Power response to the proposed Scottish Borders Local Development Plan**

Belltown Power is a UK based developer, constructor and operator of renewable energy assets. Belltown Power was established in 2013 and has to date built out a portfolio of over 20 projects across wind, solar, hydro and battery storage projects in the UK. These assets generate over 300GWh of clean electricity per year, enough to power ~100,000 homes and offset hundreds of thousands of tonnes of CO<sub>2</sub> whilst generating over £230,000 each year of community benefit funds to support local community groups, initiatives and projects. Belltown Power is a member of Scottish Renewables and Renewable UK.

This document presents the key views of Belltown Power on the proposed Scottish Borders Local Development Plan (LDP) and the contents therein.

### **Belltown Power Comments on Introductory Chapters**

The Proposed LDP does not mention the Scottish Government's declared 'climate emergency', nor is there any mention of the Scottish Government's target of:

- net-zero greenhouse gas emissions by 2045 contained in the Climate Change (Scotland) Act 2009 as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, or
- supplying the equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption from renewable sources by 2030 as set out in the Scottish Energy Strategy 2017

These are significant statements and legally binding commitments from the Scottish Government that must be central to planning policy and therefore must be reflected in the Proposed LDP.

Belltown Power would consider it appropriate that the proposed LDP is amended in order to give greater prominence to the 'climate emergency' (which was also declared by Scottish Borders council in September 2020) and the net zero target by 2045 and 50% of energy from renewable sources by 2030.

### **Belltown Power Comments on Chapter 4**

Chapter 4 of the Proposed LDP presents the 'Visions, Aims and Spatial Strategy' of the council. Belltown Power is disappointed that the plan's 'Vision' does not expressly reference the need to combat climate change and contribute to Scottish Governments target of net zero by 2045 and 50% of energy from renewable energy sources by 2030. It is recommended that this is included as other Councils have adopted in their LDPs.



# BELLTOWNPOWER

47 Corn St, Bristol BS1 1HT  
(+44) (0)117 303 5217

Indeed, in the plan's 'Aims' the 'Sustainability' box contains the only reference to climate change for which the aim is to 'Promote climate change adaption'. Given the Councils own climate change emergency declaration and the net zero target we would request that this target is included in the text and that development that helps the Council reach this target is supported.

## Belltown Power Comments on Chapter 5

In Chapter 5 of the Proposed LDP, Belltown Power is disappointed at the lack of any reference the renewable energy sector provides to the Scottish Border's economy, both directly through employment and investment as well as through use of local businesses. Renewable energy developments also make significant contributions to local communities.

Belltown Power operate a number of renewable assets which continue to contribute to the local economies within which they operate through use of local businesses. In addition Belltown Power manage community benefit schemes for operational projects, totalling over £230,000 per year across the portfolio, which contribute significantly in communities that host those projects.

## Belltown Power Comments on Chapter 8

Chapter 8 of the Proposed LDP again does not reference the Councils declaration of a 'climate emergency' which is surprising given that the Chapter is titled 'Delivering Sustainability and Climate Change Agenda'. It is recommended that this is referenced in this chapter as well as statements for the support of developments that help to deliver the range of measures contributing to the 50% of energy target by 2030 and net zero target of 2045.

The plan also refers to the Renewable Energy Supplementary Guidance (SG) and within it the Landscape and Capacity Study and Cumulative Impact Study by Ironside Farrar dated 2016 (which is a minor update to the original dated 2013). This study is outdated and was referenced in the LDP dated 2016. It is inappropriate to reference it here as it does not reflect the latest guidance or renewable technology. Belltown Power recommends that the reference to this SG is removed.

## Belltown Power Comments on Policy ED9: Renewable Energy Development

Policy ED9: Renewable Energy Development does not reflect the current policy position and should be updated. Indeed there is no reference to the 'climate emergency' declaration or the 50% of energy by 2030 or net zero by 2045 targets, all of which are recommended to be included and furthermore developments which support these goals shall be supported.

Policy ED9 again refers to the SG as raised in the paragraphs above. The Landscape and Capacity study contained within the SG is outdated, does not reflect the latest guidance or renewable technology and should therefore be removed from this section. It is not appropriate to roll over this guidance from the previous LDP in lieu of an updated version available.