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1 of 2

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From: Tim Ferguson [REDACTED]
Sent: 01 March 2014 14:22
To: localplan
Cc: Connolly, Trish
Subject: Scottish Borders Proposed LDP - Mr Jim Hewit, Easter Langlee, Galashiels
Attachments: 010314 Easter Langlee Renewable Energy Park LDP Rep.docx; FP-JH- Easter Langlee Energy Park - Site Plan.pdf

To whom it may concern

Please find enclosed a representation to the proposed LDP on behalf of our client Mr Jim Hewit. The submission relates to a proposed Renewable Energy Park at Easter Langlee, Galashiels.

I would be grateful if you can confirm receipt of this submission and should you have any related queries then please do not hesitate to contact me.

Regards

Tim

Tim Ferguson
Director



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planning

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**SCOTTISH BORDERS LOCAL DEVELOPMENT PLAN
PROPOSED PLAN**

Submission on behalf of Mr Jim Hewit

**Proposed Easter Langlee Renewable Energy Park
Galashiels, Scottish Borders.**

February, 2014

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Appendices

Appendix 1: Site Plan

1.0 PURPOSE OF SUBMISSION

- 1.1 Ferguson Planning is acting on behalf of Mr Jim Hewit the owner of the subject site.
- 1.2 This statement is a response to the consultation period available for the Proposed Plan from 6th December, 2013 to 3rd March, 2014. The LDP does not specifically safeguard any land for renewables development as part of fulfilling national renewables targets in relation to climate change. This representation supports the identification of a circa. 166 acre site to the north of Galashiels, at Easter Langlee, as a phased Renewable Energy Park opportunity.
- 1.3 Phase 1 would be for a ground mounted solar array capable of producing up to 20MW. Reference should be made to the Site Plan at Appendix 1.
- 1.4 This statement now provides an outline assessment of the site and its planning context in order to promote its suitability for allocation.

2.0 NATIONAL PLANNING AND ENERGY POLICY CONTEXT

- 2.1 The Routemap for Renewable Energy in Scotland defines clear targets for meeting Scotland's energy need for electricity, heat and transport from renewable sources by 2020. The Energy Efficiency Action Plan sets out the direction for Scotland's energy efficiency policy in the years up to 2020. These targets are:
 - At least 30% overall energy demand from renewables by 2020,
 - 100% electricity demand equivalent from renewables by 2020,
 - 11% heat demand to be met from renewables by 2020,
 - A reduction in end use energy consumption of 12% by 2020 (on 2005-2007 baseline),
 - 500 MW community and locally owned renewable energy by 2020
- 2.2 On 17th February an Agri-Renewables Strategy for Scotland was launched; a sectoral Routemap which sits alongside the 2020 Routemap and the Microgeneration Strategy for Scotland. The Strategy outlines the Scottish Government's aims and ambitions for the growth of agri-renewables in Scotland, recognising that Scotland's agriculture sector is ideally placed to contribute towards a low carbon economy. Agri-renewables are encompassed in the target for local and community ownership of 500MW by 2020.

- 2.3 The Strategy identifies six Focus Areas which are of key importance for development of renewables on farms. Under each Focus Area, actions have been identified to mitigate barriers to uptake. An example of a successful project includes Sandystones Farm, St Boswells where a 50kW ground mounted photo voltaic array was purchased and installed through the Borders Machinery Ring.

Scottish Planning Policy, 2010

- 2.4 SPP, 2010 is the statement of the Scottish Government's policy on nationally important land use planning matters. The document is currently under review. A Consultation Draft was subject to public consultation until July, 2013 and a proposed policy 'Sustainability and Planning' was consulted upon until mid-December, 2013 with a view to replacing the draft SPP's policies 'sustainable economic growth' and 'sustainable development'. The final updated SPP is anticipated in June, 2014.
- 2.5 Within SPP, 2010 at Parag. 41 the need to tackle climate change is recognised. The Climate Change (Scotland) Act sets a target of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. Annual greenhouse gas emission targets are set out in secondary legislation. It is noted that section 44 of the Climate Change (Scotland) Act 2009 requires all public bodies to act:
- In the way best calculated to contribute to the delivery of the emissions targets in the Act,
 - In the way best calculated to help deliver the Government's climate change adaptation programme and
 - In a way that it considers is most sustainable.
- 2.6 Parag. 42 states that the need to help to mitigate the causes of climate change and to adapt to its long and short term impacts should be taken into account in all decisions throughout the planning system.
- 2.7 Parag. 44 highlights that the use of energy efficient decentralised renewable energy systems will be components in the move towards reducing emissions.

- 2.8 Parag. 182 states that the commitment to increase the amount of electricity generated from renewable sources is a vital part of the response to climate change. Renewable energy generation will contribute to more secure and diverse energy supplies and support sustainable economic growth.
- 2.9 It is recognised that onshore wind and hydroelectric have been the main sources of renewable energy but that other technologies, such as solar and biomass, will feature more as they become commercially viable.
- 2.10 Parag. 84 states that planning authorities should support a diverse range and scale of renewable energy technologies and ensure that *an area's renewable energy potential is realised and optimised*.

Draft Scottish Planning Policy - Consultation Draft

- 2.11 Parag. 34 requires the planning system to help in addressing climate change through supporting the expansion of renewable energy generating capacity and heat networks.
- 2.12 Parags. 208-209 state that the planning system should support the transformational change to a low carbon economy and be consistent with national objectives and targets. Planning should support a broad mix of energy generation installations and supply infrastructure at appropriate locations.

Draft Scottish Planning Policy - Policy on Sustainability & Planning

- 2.13 It is proposed that the draft policies on 'sustainable economic growth' and 'sustainable development' within the draft SPP will be replaced with a single policy on 'sustainability and planning', and that a presumption in favour of sustainable development will be introduced into the SPP. The document highlights the need to support climate change mitigation and adaptation.

THE DEVELOPMENT PLAN IN THE SCOTTISH BORDERS

- 2.14 The adopted Development Plan for the Scottish Borders consists of the Strategic Development Plan for Edinburgh and the South East of Scotland (SESplan) which takes the local planning horizon up to 2024, with an indication of broad requirements up to 2032, and the Consolidated Local Plan, 2011. The emerging LDP, the *Proposed* LDP, was approved without amendment by Scottish Borders Council on 25th September, 2013.

STRATEGIC DEVELOPMENT PLAN

- 2.15 SESPlan sets out broad policy direction in terms of infrastructure and seeks to promote sustainable energy technologies, including the delivery of the Langlee waste facility which will lie in close proximity to the proposed renewable energy park. The Area Waste Plan for the Borders envisages the main site for waste treatment in the Borders to be at Easter Langlee and the site is to be safeguarded for this purpose.

SCOTTISH BORDERS PROPOSED LOCAL DEVELOPMENT PLAN

- 2.16 The LDP is being taken forward to reflect the strategic framework set by SESplan. The LDP sets out a number of 'Key Outcomes'. Key outcome 9 comprises 'focussing development on sustainable locations' and no.10 is 'encouraging renewable energy in sustainable locations where adverse potential cumulative impact can be avoided'.
- 2.17 The Plan recognises that encouraging renewable energy is a key part of the government response to climate change and supports the emphasis towards a low carbon economy. It is noted that within the Scottish Borders the main thrust has, so far, been through the provision of on-shore wind farms, but the potential for adverse and cumulative impact has been significant.

LDP Policy ED9 Renewable Energy Development

- 2.18 This policy recognises that burning fossil fuels is a major contributor to greenhouse gas emissions and Government support for increasing the proportion of power generated from renewable energy sources including solar, combined heat and power, biomass and energy from waste facilities. The policy is to support the development of renewable energy whilst ensuring that the impacts on the environment are properly controlled. The role of local authorities in meeting national renewable energy targets to contribute to action on climate change is highlighted.

Policy EP6 Countryside around Towns

- 2.19 It is noted that the site lies within the area designated as 'Countryside around Towns' whose aims include preventing piecemeal development and avoiding coalescence of settlement, thereby retaining their individual identity. The policy, however, states that proposals may be considered for approval if there is an essential requirement for a rural location and the use is appropriate to a countryside setting or if it has a proven national or strategic need.

Waste disposal and recycling related facilities at Langlee

- 2.20 Easter Langlee is identified as a key waste management site for the whole of the Scottish Borders. The delivery of a waste / advanced thermal treatment plant for the region to divert the majority of collected domestic and commercial waste away from landfill is being driven forward.
- 2.21 This development will also create renewable energy from waste derived fuel, with the possibility of a district heating scheme to provide heat to neighbouring households and businesses.

3.0 PROPOSAL AND OUTLINE ASSESSMENT

- 3.1 The Land at Easter Langlee is appropriate for allocation as a Renewable Energy Park extending to some 166 acres of land, with 'Phase 1' having an allocation for a ground mounted solar development with a capacity up to 20MW. Phases 2 and 3 will comprise other appropriate renewable technologies, for example biomass or anaerobic digestion.
- 3.2 The site which is the subject of this submission comprises a gently sloping (north to south east) block of land on the northern edge of Galashiels and to the west of the C77 road which lies outwith the development boundary of Galashiels. The site has been divided into 3 phases, as illustrated on the Site Plan, with a total area of circa. 166 acres. Phase 1 extends to c. 60 acres, phase 2 to c. 54 acres and phase 3 to c. 52 acres.
- 3.3 The site sits opposite the Waste/ Advanced Thermal Treatment Plant at Langlee, thereby providing a logical continuity of land use type in the area.
- 3.4 To the south are extensive established and proposed private and public housing areas and Easter Langlee Industrial estate and which could be serviced by what is proposed.
- 3.5 The location of the proposed site benefits from its proximity to a strategic renewable hub with a significant local population to serve but within a location sufficiently screened and distant from the town.
- 3.6 In accordance with the Proposed LDP policy maps and the Council's Supplementary Planning Guidance '*Local Landscape Designations*' it is understood that no landscape designations pertain to the site.

- 3.7 Technical analysis, environmental assessment and feasibility assessment will be provided as part of future planning applications for the renewables development. Initial investigations carried out by specialist consultants indicate that there would be sufficient grid and infrastructure capacity.
- 3.8 In terms of market demand and viability, a significant level of interest has been received from developers, particularly with regard to a solar development on phase 1. Initial outline financial modelling has been carried out with more detailed viability assessment underway. Ongoing investigations are being undertaken on: irradiation resource levels, grid connection, transportation and accessibility, landscape and visual impact and analysis of ground conditions.
- 3.9 It is noted that despite national and strategic targets relating to renewable energy generation, there does not appear to be any land safeguarded within the Scottish Borders, according to the LDP Policy Maps, specifically for renewable energy generation.
- 3.10 Whilst the site is located within the Countryside around Towns policy area, this type of development is appropriate to a countryside setting and there is a strategic national drive for increased generation from renewable sources.

4.0 CONCLUSIONS AND MODIFICATION SOUGHT

- 4.1 Allocation of the area of land at Easter Langlee, as identified within the Site Plan, for a Renewable Energy Park is sought. It will be dedicated to the generation of renewable energy and contribute toward meeting national and local targets and strategies for renewable energy generation.
- 4.2 There are no areas allocated within the Proposed Plan Policy Maps specifically for renewable energy generation to foster the generation on the scale proposed.
- 4.3 The site lies in close proximity to the Easter Langlee Waste Treatment Plan / Advanced Thermal Treatment Plant and is considered to be an appropriate land use particularly given the potential amenity issues which may arise from the Treatment Plant.
- 4.4 The Agent has received significant expression of interest from potential developers of ground mounted solar arrays in this area, demonstrating that there is market demand to develop such a proposal.

4.5 Detailed feasibility studies and assessments are underway and will be concluded as part of the planning application phase, but it is contended that the site, in principle, offers a sustainable location sufficiently distant from the population centre, yet in an area which has seen significant development over the past 10 -15 years.

4.6 Initial research provides an indication that there is sufficient capacity to obtain a grid connection to the project.

MODIFICATION TO PROPOSED LOCAL DEVELOPMENT PLAN

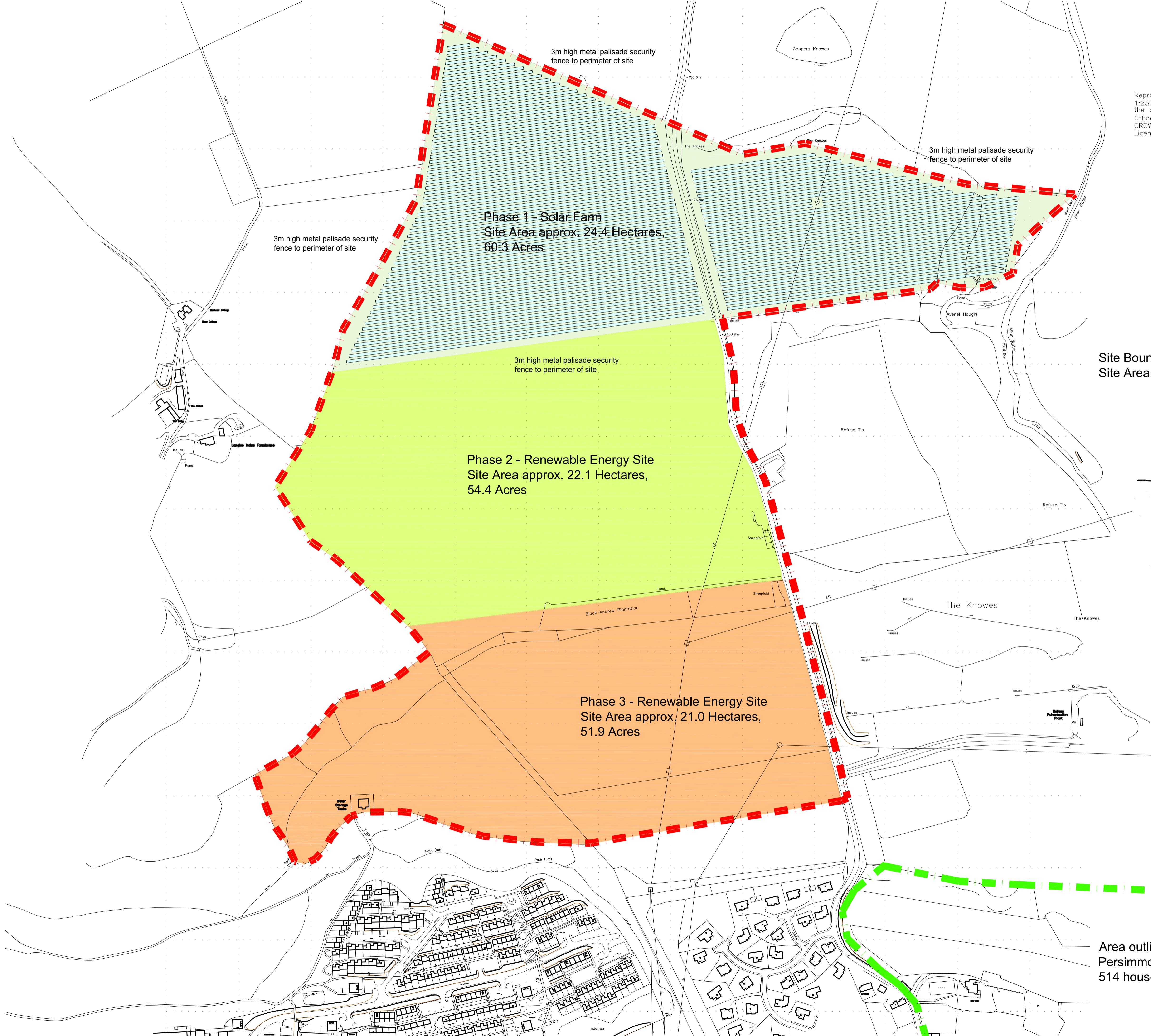
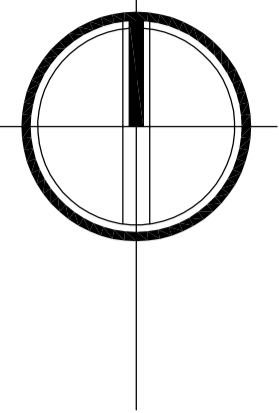
4.7 **Allocation of the area illustrated on the Site Plan for a strategic renewable energy development opportunity.**

Site Area: 166 Acres

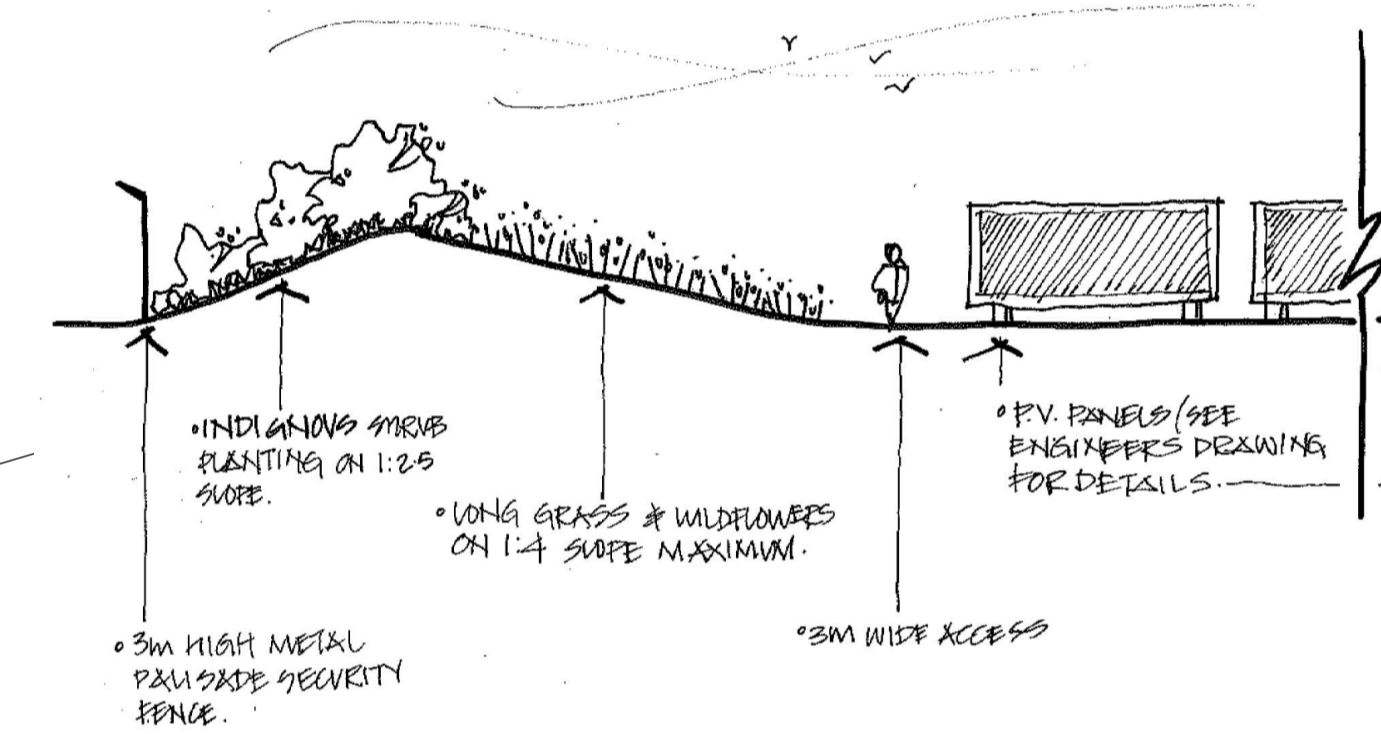
Capacity: Indicative capacity of up to 20 MW for Phase 1: Solar Park with further capacity and renewable energy development types on Phases 2 & 3

Comments: Potential to allocate an area of strategic land to support national and local targets in relation to climate change objectives.

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Site Boundary outlined in red.
Site Area approx. 67.5 hectares



PRELIMINARY

A 27.02.2014 PHASE 3 AMENDED

Revisions
project

Mr Jim Hewit
Proposed Sustainable Energy Farm
Easter Langlee
Galashiels

title
Proposed Site Plan

date Nov. 2013 drawing no. AT2053/Site/02-A
scale 1:2500 @ A1 drawn

Area outlined in green is
Persimmon Housing site for
514 houses.

Aitken Turnbull
architecture

survey

plan

create

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