

Orkney Islands Council

Draft Supplementary Guidance: Energy Consultation Report

Consultation Period: 15 December 2016 – 2 February 2017.

	<u>Unique Reference</u>	<u>Respondent Type</u>	<u>Issue</u>	<u>Comments</u>	<u>Response from Planning Authority</u>	<u>Action</u>
1.	00061	Scottish Water		The Supplementary Guidance is clear, informative and easy to follow. As the current document has taken our previous recommendations - made in September 2015 for the draft consultation on Wind Energy - into account, we do not have any further comments to make.	Support noted.	
2.	00489	Interested Person		I have to say that I think it is a very good document overall and is very encouraging that the joining up of heat and electricity is being made. My comments as ever are therefore aimed at making a good document better rather than being negatively critical. I hope my comments come over in that manner.	Comment and support noted.	
3.	00489	Interested Person		1.01: Reference to heat and renewables targets is incomplete. There is also a Scottish Govt target of 10% transport also set, but not referenced here. It needs to be since there will be interplay between batteries in vehicles and the grid in future. In addition the need for vehicle charging infrastructure will become much greater over time and EV charge points will become ubiquitous.	Add sentence at end of 1.01 to reflect 10% renewables target.	
4.	00489	Interested Person		1.02: The text is accurate, but fails to recognise that world leading supply chain for renewables in the county. This is bigger than just EMEC and ICIT. Consultants like Aquatera have a worldwide reach and bring visitors to the county and many companies are also valued overseas for their expertise. This needs re-wording.	We have sought to recognise the wider presence by referring to renewable energy companies and ancillary businesses in the text.	
5.	00489	Interested Person		Background: Overall the introduction felt as though it ran out of steam. It feels as though it needs a conclusion and the following is suggested: Orkney has ambitious targets to de-carbonise its energy system. It sees this as both important in protecting the Orkney environment, but also as an engine of economic activity. 1.01 (re-written) 1.02 (re-written) This guidance seeks to ensure that appropriate development is not stifled, whilst at the same time seeking to ensure the character if the county is not adversely affected.	Insert paragraph at 1.03 which states: "This guidance seeks to ensure that appropriate development can take place, whilst at the same time seeking to ensure the character and special qualities of Orkney are not adversely affected."	
6.	00489	Interested Person		Box A. The content of the box is excellent! There is one minor error in (v.) that it infers that Microgen and heat networks not mutually exclusive. This is not the case and there will be places where Microgen and heat networks could co-exist and planning should not prevent this. This para needs re-wording.	Support noted. This text is fixed and may not be changed as it is taken from the emerging development plan.	
7.	00489	Interested Person		Box B i. The document says: '....Development plan policies and where there is potential to connect to off-grid areas'. Why only off-grid areas? There will be plenty of 'on-grid' areas where this approach will also work and policy should not prevent it.	Support noted. This text is fixed and may not be changed as it is taken from the emerging development plan.	

8.	00489	Interested Person		Box D ii. The linkage between machines and properties is acceptable.	Noted.	
9.	00489	Interested Person		D iii c. Disagree with blanket ban imposed. The National Scenic Areas are not natural landscapes and will not be undermined by some development.	This is fixed on National Legislation and OIC has no control/influence on the matter.	
10.	00489	Interested Person		D vi. If there is no time limit on the planning permission for my house, then why would there be a time limit on the house's power supply? The 25 year limit is illogical and smacks of 'fear of the new'. There is no reason to impose life limit on renewables any more than any other development item.	This element of core policy was amended through Examination to state that development "may" be limited to 25 years, rather than "will". Where appropriate, a longer timeframe will be given.	
11.	00489	Interested Person		1.05: Flood storage should refer only to fluvial flooding. Areas susceptible to tidal flooding will be unaffected by consumption of flood volume.	This specific text was sought by SEPA and will remain.	
12.	00489	Interested Person		1.09: Good reference to positive impacts. 2.04: Good that the supply chain is recognised as important.	Support noted.	
13.	00489	Interested Person		2.13: Emissions are not necessarily a threat only if >20MW, it is the aggregate of the emissions that does the damage. So why can no positive benefit be claimed for renewables under 20MW? This approach is not applied in terms of other incremental impacts such as flood policy or sewage load. This position is therefore Illogical.	The 20MW figure was suggested by Government advisors. If a co-ordinated argument were submitted on a specific application demonstrating a meaningful contribution to counterbalance impacts on known constraints it would be considered.	
14.	00489	Interested Person		3.01: No mention of heat-pumps. Note geothermal is NOT the same as ground source heat pumps.	Add "heat pumps" after "Marine" at 3.01.	
15.	00489	Interested Person		Q1. Prefer Option B. I.E. 4 or more turbines = a farm. Disagree with Policy 2 (SP2) that neolithic heart requires absolute prohibition. There were wind turbines in the area now designated before it was designated. Limited an appropriate development should not be opposed.	Preference noted. SP2 is fixed by Government and OIC has no control/influence on the matter. Please note this only applies to the monuments themselves and not the setting.	
16.	00489	Interested Person		4.28: Matt finish to turbines – good.	Support noted.	
17.	00489	Interested Person		4.33: This paragraph lacks scientific underpinning and is highly subjective. Whilst I do not expect it to change I do not wish the policies to ever go unchallenged. Note too that there is acceptance that change is appropriate by Scottish Historic Environment and needs managing in 4.55 as opposed to absolutely preventing. Regrettably 4.33 seems to fly in the face of this pragmatism.	Opinion noted. This paragraph is not a policy test and steers applicants/planners to DC6 which includes 4.55. There are plenty of studies and it is widely accepted as fact in archaeological theory that certain monuments are intrinsically linked to the landscape, especially for example Maeshowe, and it is appropriate to include the paragraph here.	
18.	00489	Interested Person		Dev. Criterion 7: Should be 'Fresh' Water Environment. At the moment it looks as though it will capture the marine environment and the drivers stated are inappropriate for the seas.	Certain areas, for example Stenness Loch, may be affected which are not fresh water.	
19.	00489	Interested Person		4.78: The phrasing in this paragraph is ambiguous. Depending on scale... all scales could.... Either all developments could be required to submit a statement or else it is only necessary for particular	This would depend on the sensitivities of a given site.	

				scales. Please clarify.		
20.	00489	Interested Person		4.82 et seq. I disagree with Landscape Capacity Assessment generally as it is highly subjective and wrapped up as pseudo-science.	Opinion noted.	
21.	00489	Interested Person		6.01: Storage does not only have to happen where grid is inadequate. Storage will increasingly permeate the network and not be limited to such areas. There is no need to limit storage to being near generation. It may technically be needed near point of use or export. The requirement for proximity is therefore inappropriate and should be dropped. On the other hand; storage may be needed near a generator and this should not be prohibited or subject to additional hurdles.	Paragraph will be replaced with: "The development of energy storage solutions associated with new and existing renewable developments will be supported."	
22.	00489	Interested Person		6.03: No need to limit the location of storage to hard-standings. This may impede future maintenance of the generator. This is micromanaging development and should be avoided	Amend text to require that "applications for energy storage solutions should consider utilising....."	
23.	00489	Interested Person		6.04 Ultra-varies? The final use of a fuel is not relevant to granting of planning permission and this paragraph should be omitted.	This will allow potential adverse impacts to be weighed against benefits and is therefore necessary.	
24.	00489	Interested Person		Overall the unreferenced paragraphs are supported as they are.	Support noted.	
25.	00057	Scottish Government		Wind Energy In relation to paragraph 4.13 of the SG, please note that SNH has been working on guidance to give clarity to the assessment of wild land areas. This is due to be published shortly.	Noted.	
26.	00057	Scottish Government		On noise we suggest that the text below in red is added to paragraphs 4.21 and 4.22. 4.21 One is mechanical noise from the components of the turbine (gearbox, generator and drive train) and the other is aerodynamic noise from the passage of wind through the blades. Both vary depending on a number of factors including the turbine model and size. 4.22 Noise Impact Assessments will be undertaken in accordance with the Scottish Government's Technical Advice Note: Assessment of Noise (2011), and the IOA good practice guidance on wind turbine noise. http://www.ioa.org.uk/publications/wind-turbine-noise	Text will be amended accordingly.	
27.	00057	Scottish Government		The wording in paragraphs 4.39 and 4.40 on compensatory measures is unclear. It appears to suggest that Scottish Ministers would be liable to secure compensatory measures. Paragraph 208 of SPP states that derogation is available for authorities. We advise clarifying the wording in line with the SPP.	Replace "they have" with "the Councillors".	
28.	00057	Scottish Government		The Council should consider whether the SG adequately addresses paragraph 170 of the SPP "areas identified for wind farms should be suitable for use in perpetuity" and paragraph 174 "the current use of the site as a windfarm will be a material consideration".	This is enshrined in SPP and will be considered at the application stage.	

29.	00057	Scottish Government		Heat Networks, Energy from Waste and District Heating Please note that the Scottish Government has produced on line advice on Planning and Heat http://www.Gov.Scot/Resource/0048/00488003.Pdf . This includes advice on the use of energy statements to support planning applications, proportionate to the scale of development. These include an assessment of whether a district heating solution is technically feasible and financially viable. This may be something that it would be of value to include guidance on as part of the SG.	Noted. Add the following paragraph 5.04: "Where an applicant does not believe a district heating system is technically feasible or financially viable, an energy statement which is proportionate to the scale of the development should be submitted in support of the application". Add link to further information section.	
30.	00569	Interested Person		Thank you for the opportunity to respond to this consultation. Subject the specific comments below, I feel the draft is proportionate and offers a comprehensive and balanced set of draft guidelines for the development of renewable projects. I would like to make the following specific comments: I disagree in principal with the blanket ban suggested for The National Scenic Areas. Proposed developments should be assessed on a case by case basis on the basis of the projects merits and not determined against a prescribed map of what an outside agency considers important within our landscape.	Support noted. The requirement to exclude windfarm development from the NSA is set in National Policy and OIC has no means to alter this.	
31.	00569	Interested Person		The maximum planning period of 25 years is outdated and should be removed.	The policy has been updated to make this discretionary.	
32.	00569	Interested Person		I agree whole heartedly with 1.08 Community Benefit, although I feel the text is a little ambiguous and could be strengthened. An element of community benefit should be mandatory for all developments of all sizes including micro turbines.	Noted. Where there are foreseen adverse impacts on known constraints, community benefit can form part of the argument to demonstrate that the socio-economic benefits outweigh the constraints. This applies to all scales of turbine.	
33.	00569	Interested Person		Monitoring 4.07. The Council's preference for digital monitoring is just not practical. For technical and commercial reasons the wind industry's preferred method for wind monitoring are met masts. Digital monitoring is useful under some circumstances but the scope is limited and it is prohibitively expensive.	Elected Members have been clear that this is the preferred means of monitoring, unless there are specific technical reasons relating to a given application.	
34.	00569	Interested Person		Definitions 4.10. I am a champion for onshore wind, although I would not like to see turbines dotted all over the landscape. For that reason, I feel very strongly that all turbine developments of whatever scale should conform to the special framework and I would therefore opt for alternative 2. There have been some truly terrible mistakes made in the past in approving applications for a number of micro turbines, and they should be subject to the same rigor as larger developments.	Preference noted.	
35.	00569	Interested Person		Landscape Capacity Assessment. I disagree that the Landscape Capacity Assessment should be taken into account as a material planning consideration. Landscape capacity is part of the broader picture of which landscape and visual effects are only one of the criteria to be considered. SNH good practice guidance states that capacity studies should not aim to define the number of wind turbines in the landscape, rather they should assess the sensitivity of the landscape only, and I would urge the Council to revisit the guidance to ensure it is in line with updated national planning guidance and policy, and to remove height and	Opinion noted.	

				capacity limits from The Landscape Capacity Assessment to ensure it accords with SPP. The Landscape Capacity Assessment is also highly subjective, and I do not believe that the opinions expressed by the planning consultants about the acceptability of turbine sizes and location reflect the majority of local views, nor do I believe that a landscape consultant should be commenting on the acceptability of sites and advising upon fundamentally crucial strategic development options for Orkney's future.		
36.	00068	Neighbouring Authority		<p>We do not wish to make any formal comments on specific issues, but offer a few general comments from The Highland Council's officers.</p> <p>In particular, we note with interest your proposed approach to guidance in respect of the following which are increasingly to the fore as issues for consideration:</p> <ul style="list-style-type: none"> • Balancing impacts of development – particularly the inclusion of content on 'net economic benefit'; • Wind Energy: monitoring equipment – particularly the reference to 'digital monitoring equipment' which could provide a lower impact alternative to anemometer masts; • Heat networks, energy from waste and district heating – particularly your intention to prepare advice for individual heat networks; we draw attention to the current workstream of the Scottish Cities Alliance to draft planning policy, guidance and energy assessment template which in due course, subject to some local adaptation if necessary, may be of interest to OIC (and we also mention current work of The Highland Council to prepare an 'energy strategy' and to identify opportunities for potential district heating networks as part of our Area Local Development Plan work); • Fuel and energy storage – particularly energy storage (a topic on which The Highland Council sought input from the industry through the Main Issues Report consultation for the Highland-wide Local Development Plan). 	Comments noted.	
37.	00068	Neighbouring Authority		<p>With regard to the 'Spatial Strategy Framework' for Wind Energy:</p> <ul style="list-style-type: none"> • We note that with respect to separation distances around towns and villages (Scottish Planning Policy 'community separation distance'), in the current version of your spatial framework you have kept this at 2km for the time being – with the intention of undertaking survey work during the lifetime of the Local Development Plan to refine these; with the caveat that you have provided stating that impacts will be considered on a case by case basis in the meantime, this seems a reasonable and pragmatic approach; • We note that whilst you are seeking views on potential alternatives to your definition of 'windfarm' for determining the size of scheme to which your spatial framework will apply, your current definition (in your Table 1) is consistent with that in The Highland Council's recently adopted Onshore Wind Energy Supplementary Guidance (November 2016). 	Comments noted.	

38.	00068	Neighbouring Authority		<p>With regard to 'Development Criterion 2 – Landscape and Visual Impact' for Wind Energy:</p> <ul style="list-style-type: none"> We note that this section of the draft refers specifically to impacts on the landscape character or visual amenity of Orkney – whilst in the majority of cases the impacts are likely to be limited to Orkney, it would be helpful if the guidance were written in a way that reflected that landscape and/or visual impacts may be further reaching, for example beyond Orkney to neighbouring Highland; In that regard, we draw attention to The Highland Council's recently adopted Onshore Wind Energy Supplementary Guidance (November 2016) and our Onshore Wind Energy: Draft Landscape Sensitivity Appraisal which includes Caithness and on which consultation recently closed. 	<p>Comments noted. Text will be modified so that it applies to all landscape and visual impacts, in order to prevent any potential unacceptable impacts on neighbouring authorities.</p>	
39.	00571	Interested Group (Energy)		<p>Local Energy Scotland is a consortium made up of the Energy Saving Trust (EST), Changeworks, The Energy Agency, SCARF and The Wise Group. Local Energy Scotland administers and manages the Scottish Government's Community and Renewable Energy Scheme (CARES) with support for delivery from Ricardo-AEA.</p> <p>In response to the consultation on the Energy Draft Supplementary Guidance Section 1.09 (Positive Impacts) and Section 2 (Balancing Impacts of Development) it is noted that reference should be included relating to community and local ownership in renewable energy projects. Where a community organisation is a meaningful financial partner in a renewable development this can be considered as shared ownership in the assessment of the planning application.</p>	<p>Comment noted. Add paragraph at 2.04 to reflect advantages of shared ownership.</p>	
40.	00571	Interested Group (Energy)		<p>1. The Scottish Government's Draft Energy Strategy (Jan 2017) sets out the following two new targets (p45,116):</p> <p>"1 GW of community and locally-owned energy by 2020, and 2 GW by 2030; and at least half of newly consented renewable energy projects will have an element of shared ownership by 2020."</p>	<p>Noted.</p>	
41.	00571	Interested Group (Energy)		<p>2. The Scottish Government's Good Practice Principles for Shared Ownership of Onshore Renewable Energy Developments (Sept 2015) note the following in relation to Shared Ownership and the Planning System (p12):</p> <p>"Renewable energy projects are assessed against development plan policies and on their individual merits, taking into consideration the relevant environmental, economic and social effects of each project. Shared ownership projects offer the opportunity to engage meaningfully with communities and to consider from an early stage how any income resulting from a shared ownership arrangement could be used to best effect in the area.</p> <p>Where such discussions have been conducted, developers may wish to reflect this in a planning application. Developers must not request community support for (or indeed no objection to) the application as a condition of offering shared ownership.</p>	<p>Noted, and included in new paragraph at 2.04..</p>	

				(continued)		
42.	00571	Interested Group (Energy)		<p>National Planning Framework 3 states that local and community ownership and small-scale generation can have a lasting impact on rural Scotland, building business and community resilience and providing alternative sources of income. Collectively, the potential benefits of community energy projects are nationally significant. Shared ownership projects may generate positive social and economic impacts as they are likely to build capacity and generate income locally. Paragraph 169 of Scottish Planning Policy sets out development management considerations for proposals for energy infrastructure developments, including wind energy. It notes that relevant factors will vary relative to the scale of the proposal and area characteristics but are likely to include, among other things:</p> <ul style="list-style-type: none"> • Net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. <p>Net economic benefit (SPP paragraph 29) is a material planning consideration. Where a community group is involved in the project from an early stage, and will receive long term socio-economic benefits over the lifetime of the project, the developer may wish to include the expected net economic benefits in a planning application.</p> <p>Where resulting benefit to a local community is quantifiable, this can be presented in a planning application. This benefit is often focused on income and/or jobs and may be set out in material supporting a planning application. Where developers are exploring a shared ownership opportunity but have not identified an appropriate partner group, the intention for shared ownership can be outlined in a planning application but will not be considered to be as strong as those with an identified and committed partner.” (continued)</p>	Noted.	
43.	00571	Interested Group (Energy)		<p>It goes on to state that (p14):</p> <p>“Where local benefits are proposed through a shared ownership opportunity and there is an intention to secure a partner organisation, this may be taken into account.</p> <p>Where a planning application provides evidence of the following points, there will be greater certainty that the expected benefits to the economy from the proposed shared ownership arrangement will be delivered.</p> <ul style="list-style-type: none"> - Well-progressed shared ownership opportunity - Identified partner organisation - Quantified and evidenced local benefits including: <ul style="list-style-type: none"> - Defined income to community for lifetime of the project - Community plans and projects in place to deliver local objectives using long-term revenue.” 	Noted.	

44.	00571	Interested Group (Energy)		<p>3. It is also noted in a letter from the Chief Planner, Scottish Government Planning and Architecture Division to all Heads of Planning entitled 'Energy Targets and Scottish Planning Policy' that was published on 11 November 2015 that the Scottish Government's policy continues to support "new onshore renewable energy developments, including onshore wind farms and particularly community owned and shared ownership schemes. This policy support continues in the situation where renewable energy targets have been reached".</p> <p>The letter states that:</p> <p>"Scottish Planning Policy on delivering heat and electricity is clear that the planning system should support the transformational change to a low carbon economy, consistent with national objectives and targets, including the 100% target mentioned above. This does not place a cap on the support for renewable energy developments, including on-shore wind once the target has been reached.</p> <p>We expect development plans to continue to provide spatial frameworks for onshore wind in accordance with the approach in Scottish Planning Policy and that individual decisions be informed by the relevant development plan policies, themselves informed by the considerations set out in paragraph 169 of Scottish Planning Policy. (continued)</p>	Noted.	
45.	00571	Interested Group (Energy)		<p>Whilst the ownership of any development is not a material consideration in determining the acceptability of the development in planning terms, in National Planning Framework 3 and the Electricity Generation Policy Statement the Scottish Government commits to achieving at least 500 megawatts of renewable energy in community and local ownership by 2020.</p> <p>National Planning Framework 3 paragraph 3.24 states 'Local and community ownership and small-scale generation can have a lasting impact on rural Scotland, building businesses and community resilience and providing alternative sources of income. Collectively the potential benefits of community energy projects are nationally significant.'</p> <p>Scottish Planning Policy paragraph 169 is clear that net economic impact including the community socio-economic benefits such as employment, associated business and supply chain opportunities are relevant material considerations in the determination of planning applications for renewable energy applications, including on-shore wind. It is our expectation that such considerations are addressed in the determination of applications for renewable energy technologies."</p>	<p>Noted.</p> <p>Add paragraph below at 2.14: "Local and community ownership can have a lasting impact, building businesses and community resilience and providing alternative sources of income. These factors can be taken into consideration when calculating the net economic and socio-economic impacts of a development."</p>	
46.	00565	Interested Person		<p>Generally the guidance notes are good although I feel the council planning department should be looking at the energy infrastructure as a whole not just individual planning applications. For example although the guide makes comment about the Energy storage (chapter 6) has OIC discussed with SSE the integration of renewable energy into the existing grid system? Even with the development of</p>	<p>Point noted.</p> <p>Although the Planning department has a statutory responsibility to produce guidance relating to specific applications, there is cross-departmental engagement with colleagues working on grid and infrastructure issues.</p>	

				the "smart Grid system" and energy storage the driving force seems to be over capacity by wind turbines rather than a strategic approach to curtailing electrical production until the energy storage/redistribution is in place.		
47.	00565	Interested Person		1. Generally supporting evidence for any new development needs to be independent from the applicant where possible, For example archaeology and ecological reports tend to be carried out by a third party which is good. But individual and cumulative impact is rather subjective and invariable supports the developer when carried out by them. I would suggest a weighted matrix be used to supplement the LVIA. Strategic locations (High sensitivity to low sensitivity) be allocated a numerical value (5 to 1) which is then multiplied by the potential visual impact. For example if 10% of a turbine or farm is visible from a NSA or the WHA (high sensitivity) then 5x1, if it was a low sensitivity location but 50% was visible then 1x5. Key view points should be selected buy OIC, SNH, tourist group and HES and the visual impact calculated independently.	Suggestions noted. LVIA should be undertaken in accordance with national best practice guidelines and to a scale proportionate to the proposed development.	
48.	00565	Interested Person		2. Shadow flicker should also be considered in relation to A class roads, Orkney's unique sunrise/sunsets can mean driving is difficult at these times - add in rotating blades and you have potential accident scenario.	This would be a material consideration.	
49.	00565	Interested Person		3. I would add core paths and ROW's to section 4.35	Suggestion noted.	
50.	00565	Interested Person		4. In section 1.07 I would include the need to transport material for repair - the movement of turbine blades and even offshore renewable equipment needs to be considered.	Add "maintenance" to the final sentence in 1.07.	
51.	00565	Interested Person		5. In section 2 Balancing impact - there is no mention of the additional impact of sub-stations, pylons or alteration to the road network. Also only the positive impact (1.09) is discussed what about the negative impact to the economy - tourism and holiday rentals I suggest you have a 1.10 section with negative impact - I can write this for you if you want.	This is covered at 2.05.	
52.	00565	Interested Person		6. Decommissioning - a financial bond is mentioned but this needs to be enforced for all turbines which leads me to section 4.81. How will this be monitored? If your response is that the owner will have to tell you then it is a joke. A robust monitoring system needs to be in place - SSE should be able to identify turbines not producing energy. Similarly if the turbine is say 50% below its predicted capacity then it should be decommissioned. This will improve the landscape and reduce the grid burden.	Your views are noted. OIC has a Planning Control Officer who monitors planning conditions and responds to any reports regarding alleged breaches of planning control.	
53.	00565	Interested Person		7, finally Orkney has a high fuel poverty yet in 2014 Orkney had 11% of the UK's turbines FiT's - in addition to the community benefit payment OIC should negotiate with the developer a subsidised electric tariff for properties affected (visual distance) by existing and new wind turbine developments.	Your views here will be passed to colleagues in relevant council departments, who will consider the legality of your suggestions. Any such negotiation would need to be detached from the planning process in the same way that community benefit is. It is not within the remit of OIC to negotiate benefits for private individuals with developers.	

54.	00565	Interested Person		Finally can I suggest that for large and very large turbines alternative locations and heights be included in the application to allow a comparative assessment. Moving a turbine 20m down slope or reducing the height by 20m might reduce the visual impact dramatically with little impact on output.	Any EIA should include a statement of alternative locational arrangements and reasons for their being discounted. Where this is not the case, alternative sites are considered through the assessment process.	
55.	00568	Developer (Renewables)		Please can you clarify why West Hill in Flotta shown on the attached map [map attached to original submission] has been designated as an area of significant protection in relation to the development of wind energy projects. The land falls out with 2km of any settlements and is not designated for any statutory wildlife or natural heritage protection. I believe it should be designated as an area with potential for windfarm development.		
56.	00564	Agent		With respect to the amount of power generated from renewables, we would have some reservation on the content of paragraph 2.13 and the suggestion that "It is unlikely that a legitimate argument may be formulated in relation to these factors unless the proposal is a 'major' development (i.e. 20MW or greater)". In the context of Orkney, it may be difficult to find sites that are capable of delivering development in excess of 20MW. Scottish Government Reporter's have recognised more modest contributions and it would therefore seem illogical to apply a limit at the major application threshold. With the evolution of higher capacity turbines, it may be possible to generate increased power from smaller machines. The application of an arbitrary threshold may undermine OIC's aspirations to develop certain technologies, and would most likely be challengeable, and contrary to wider legislation and policy with respect to climate change. We would expect a broader statement seeking to maximise the capacity of available technology to be more fitting.	This threshold was offered through discussions with Government officers. The text is tempered with the "it is unlikely that...." precursor to the statement to acknowledge that an argument can be made. Such an argument may refer to multiple proposals.	
57.	00564	Agent		JLL are instructed by Hoolan Energy and act as planning and development advisors in relation to their development interests in Orkney. Hoolan Energy welcome the opportunity to comment on the Supplementary Guidance: Energy consultation draft ("The SG"). We hope that the comments below with respect to policy can be viewed in the relevant context and overarching aspirations of OIC to recognise the opportunities presented by renewable energy and in particular the opportunity to harness onshore wind ensuring whilst ensuring that there are no unacceptable impacts on relevant environmental and community interests. In many respects the proposed renewable energy policies have been drafted to reflect this theme and we welcome this approach. In particular we note the background to the production of The SG, and recognition of Scottish Government targets, and the duty upon public bodies to mitigate against climate change and the potential of renewable energy in bringing about a "modal shift" towards low carbon forms of energy. The Scottish Government's stance on the renewable energy has been updated in January of this	Comments noted.	

				<p>year. The Scottish Government has been clear in setting out that the sectors responsible for most emissions are energy, transport and agriculture and although significant progress has been made in decarbonising the energy sector (in particular with the closure of Scotland's last coal fired power station at Longannet) the Climate Change Committee has stated that stronger policies are needed in a new Climate Change Plan.</p>		
58.	00564	Agent		<p>Against this background, on 19 and 24 January 2017 the Scottish Government published three energy policy documents, namely:</p> <ul style="list-style-type: none"> • the draft Climate Change Plan; • the draft Scottish Energy Strategy 'The Future of Energy in Scotland'; and • the Onshore Wind Policy Statement <p>Together, these three policy documents represent the Government's intended energy and climate change strategy for the period to 2050. The documents have been issued for consultation purposes with a closing date set as 30 May 17. Some of the specifics within the documents are potentially subject to change as a result of the ongoing consultation therefore it may be too early to incorporate the terms into The SG. However, insofar as the documents contain clear policy direction, The SG may reflect these terms in order to present the most up to date position upon publication.</p>	Points noted.	
59.	00564	Agent		<p>The Second Paragraph of The SG, recognises the renewable energy sector as a growth sector for both the Scottish and Orkney economies and the contribution that the industry brings in terms of both employment and investment but also the attraction of Orkney as a place to study the energy sector. Hoolan Energy support the recognition of these facts.</p> <p>With respect to the policy context we note that The SG, references Policy 7 of the emerging LDP which is stated at paragraph 1.04 to "support appropriate renewable energy development".</p> <p>Whilst the policy is supportive, we note that there remains one significant respect in which the policy deviates from, "Scottish Planning Policy" (SPP) and the Scottish Government's online guidance in relation to renewable energy.</p> <p>In particular Scottish Government Online Guidance on renewable energy sets out guidance in relation to the preparation of policy, guidance and spatial frameworks and seeks that planning authorities:</p> <p>"Consider whether existing spatial frameworks and policies are consistent with Scottish Planning Policy to Determine if they proactively respond to the Renewable Energy Action Plan and current national targets for electricity from renewable sources;"</p>	Noted.	
60.	00564	Agent		<p>Considering The SG, and the policy listed in pages 3 and 4, (which appears to largely repeat Policy 7 of the emerging LDP), there is a level of inconsistency with SPP with respect to the assessment of onshore wind that would challenge the appropriateness of the policy and its subsequent use in assessing onshore wind proposals. The primary difficulty with the policy is that it appears to require that:</p> <p>"Proposals for wind energy developments of all scales, including</p>	<p>Noted.</p> <p>Throughout the document this is qualified and supported through the terminology "unacceptable" to ensure compliance with SPP. There have been no concerns raised on this matter by the Government.</p>	

				<p>extensions to existing developments and repowering, will be assessed against the following factors to ensure that there will be no significant adverse individual or cumulative impacts:"[emphasis added] on a range of criteria as listed in the policy.</p> <p>It is widely recognised by the Scottish Government, through policy and subsequent appeal decisions that commercial scale onshore wind proposals will normally result in significant impacts. A significant impact is not necessarily an unacceptable impact, but the policy as drafted would not only be less robust but is likely to be challengeable upon appeal if used in the assessment of onshore wind where significant impacts are commonplace and require to be assessed in the planning balance.</p>		
61.	00564	Agent		<p>The lack of an allowance to assess significant impacts in the planning balance would be likely to result in significant challenges to achieving the electrification agenda¹ for Orkney as identified in the MIR and discussed in previously submitted JLL representations to OIC on the former draft SG.</p> <p>The issue is easily remedied with the introduction of the word "unacceptable" prior to the word "significant" in part Di, of the policy. This would allow the proper identification of all impacts and their significance through Environmental Impact Assessment (EIA) or Environmental Assessment (EA) and the assessment of those impacts (and their significance) against the relevant considerations listed within the policy and set out within paragraph 169 of SPP.</p> <p>The balancing exercise of assessing the positive and negative aspects (significant impacts) of a development does seem to be incorporated within paragraph 1.09 of The SG and again in section 2, but in order for the policy to be read and function in this manner, and comply with SPP, this would require to be built into the policy itself.</p>	It is not possible to amend core policy at this stage. Throughout the document this is qualified and supported through the terminology "unacceptable" to ensure compliance with SPP. There have been no concerns raised on this matter by the Government.	
62.	00564	Agent		<p>We note paragraph 4.07 and the statement that "digital monitoring equipment" is preferred to "physical anemometer masts". Whilst the preference is noted, it is considered that the requirement would seem overly restrictive. Anemometer masts are not normally a particularly dominant feature within the landscape and it is common practice to require such structures over a temporary period to accurately test the wind resource. Whilst digital equipment can to some degree deliver data, the industry will usually look to conventional equipment over a prolonged period of time, where the deployment of digital technology would not be appropriate. Clearly each situation would have to be assessed upon its merits and particularly sensitive locations may merit the deployment of such technology.</p>	This preference reflects views expressed by members of the public and Elected Members, where it is not technically achievable, alternative monitoring would be supported.	
63.	00064	SNH		<p>Question 1 Wind Farm Definition</p> <p>We consider that based on the landscape capacity study the preferred approach is the most appropriate option. If the council pursued Alternative 1 this could be misleading for developers as in terms of landscape capacity of the NSA the scale of Alternative 1 developments would not be appropriate.</p>	View noted.	

64.	00064	SNH		<p>Comments on the rest of the document</p> <p>Development Criterion 2 – Landscape and Visual Impact</p> <p>We note the text in 4.26 which states ‘where necessary to demonstrate that there will not be an unacceptable adverse impact’. In our view this seems to imply that developers will be able to make impacts sound insignificant, rather than that the LVIA allows OIC to assess impacts. We recommend that it should be reworded as ‘where necessary to enable objective assessment of potential significant adverse impacts’.</p>	The text will be amended as suggested.	
65.	00064	SNH		<p>Within section 4.29 we recommend that a link is provided to where the “Landscape Capacity Assessment for Wind Energy in Orkney document” can be found on the web.</p> <p>We also recommend that it would be useful to provide a reference in para 4.29 of the supplementary guidance to the landscape capacity section and more closely tie in the landscape capacity study with the development criteria. We recommend a suitable section to add text is after “...to inform site selection and to support any LVIA.” We suggest text such as “Para 4.82 onwards contains more information on the landscape capacity assessment for wind energy in Orkney”</p>	<p>Links will be provided in the further information section.</p> <p>It is not felt appropriate to reference 4.82 onwards at this point as it is clear from contents page that the section exists.</p>	
66.	00064	SNH		<p>We recommend that 4.31 should be a separate heading for Hoy wild land. We have recently published for consultation draft guidance on assessing impacts on Wild Land Areas http://snhwebsite:8090/docs/A2179580.Pdf and have also published Wild Land Descriptions and the Hoy description can be found here. Http://www.Snh.Gov.Uk/docs/A2027835.Pdf</p>	<p>Add headings as suggested.</p> <p>Insert links in the further information section if adopted.</p>	
67.	00064	SNH		<p>Development Criterion 3 – Natural Heritage</p> <p>We note that the emphasis is on international and national designations in this section. We consider it would be useful to also explain the level of protection awarded to local designations and where people can find out where and why they are designated. This may help provide a developer with information so they can take account of any local sensitivities when planning a development. We recommend this information is in a separate section from the section on wider biodiversity and the LBAP.</p> <p>The following links could be useful to be included in Development Criterion 3 – Natural Heritage:</p> <p>http://www.Snh.Gov.Uk/docs/A1663759.Pdf - Spatial Planning for onshore wind turbines – natural heritage considerations</p> <p>Wind farm impacts on bird guidance http://www.Snh.Gov.Uk/planning-and-development/renewable-energy/onshore-wind/windfarm-impacts-on-birds-guidance/</p>	This information is included within relevant guidance documents (SG Natural Heritage and Local Biodiversity Action Plan).	
68.	00064	SNH		<p>Development Criterion 9 –Construction and Decommissioning</p> <p>We support the information provided on the section on construction and decommissioning. We have several pieces of guidance that may be useful to be included in this section.</p> <ul style="list-style-type: none"> - Guidance for aftercare following construction we suggest Good practice during wind farm construction http://www.Snh.Gov.Uk/docs/A1168678.Pdf - For further guidance on aftercare following decommissioning we have produced guidance to develop a common approach to decommissioning and repowering plans (DRPs) for on-shore wind 	<p>Add line at the foot of further information page to advise that SNH has a comprehensive suite of information and guidance, which may be helpful to developers.</p>	

				farms. Http://www.Snh.Gov.Uk/docs/A1434319.Pdf . - We have also undertaken research and guidance on restoration and decommissioning of onshore wind which can be found at the following link http://www.Snh.Org.Uk/pdfs/publications/commissioned_reports/591.Pdf		
69.	00064	SNH		There are variety of other sources of general advice and guidance on the following webpage which could be useful in the further information section of the SG. Http://www.Snh.Gov.Uk/planning-and-development/renewable-energy/onshore-wind/general-advice-and-information/	Add line at the foot of further information page to advise that SNH has a comprehensive suite of information and guidance, which may be helpful to developers.	
70.	00064	SNH		The following links to further sources of information which could be useful to be included in Development Criterion 2 – Landscape and Visual Impact - Landscape impacts guidance http://www.Snh.Gov.Uk/planning-and-development/renewable-energy/onshore-wind/landscape-impacts-guidance/	Links will be provided in the "further information" section.	
71.	00047	Historic Environment Scotland		Thank you for your consultation on the above draft Supplementary Guidance (SG). We have reviewed these documents in relation to our main area of interest for the historic environment. We welcome that you have embedded historic environment considerations into the SG and have no detailed comments to offer.	Support noted.	
72.	00062	SEPA		General Considerations 1.1 We note the statement in paragraph 1.05 that "All renewable energy components, associated infrastructure and construction compounds should be located outwith areas that are identified as being at medium to high risk of flooding, to avoid any piecemeal reduction in flood plain storage. Landraising should also be avoided when creating new access tracks unless it can be demonstrated that there will be no reduction in flood storage and no adverse effect on the conveyance capacity of the flood plain."	Noted.	
73.	00062	SEPA		1.2 We support this approach as the cornerstone of sustainable flood risk management is the avoidance of flood risk in the first instance. However as per the flood risk framework of Scottish Planning Policy (SPP) infrastructure in the flood plain is acceptable where it has to be located there for operational reasons (like for wave energy), provided there is no increase in risk elsewhere. It needs to be designed to remain operational during flood conditions, and be justified. You may therefore wish to consider making some reference to this by adding for example a sentence worded along the following lines or similar "In line with SPP infrastructure in the flood plain may be acceptable where it has to be located there for operational reasons, provided it does not increase flood risk elsewhere and is designed to remain operational during flooding conditions."	Additional text will be added.	
74.	00062	SEPA		Other Positive Impacts 1.3 It may be helpful for the applicant where you refer to "relate to the scale of any contribution to renewable energy	We are seeking to limit the number of external documents referred to and linked through the document. This reference will, however, be provided to applicants in discussions.	

				generation targets and the effect of the proposal on greenhouse gas emissions", in paragraph 2.12, to reference paragraph 154 of SPP as this includes links to example the document 'Low Carbon Scotland - Meeting our Emissions Reduction Targets 2013-2027' which may be of assistance to the applicant.		
75.	00062	SEPA		Wind Energy Definitions 1.4 In regard to question 1: Wind Farm Definition, as landscape is an issue outwith our remit we have no advice on the 4 alternative definitions provided.	Noted.	
76.	00062	SEPA		The Development Criteria for all types of wind energy development 1.5 Further to the comments in our response to the draft Wind Energy SG we welcome the rewording of the paragraph in paragraph 4.65 and the addition of paragraph 4.66 referencing the importance of restoring degraded peatland sites and exploring opportunities for the incorporation of habitat improvements through the habitat management plans.	Support noted.	
77.	00062	SEPA		1.6 We welcome the reference to the water environment including burns, rivers, lochs, wetlands, groundwater, reservoirs and any impacts on private water supplies and the rewording of paragraphs 4.70 and 4.71. As previously advised "We also recommend that you include reference to the requirement for authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) for any engineering activities in the water environment" within this section or the Further Information on Wind Energy Development section.	Add reference in the further information section.	
78.	00062	SEPA		1.7 As advised previously "we would object to a policy approach which supports wind turbine developments in certain areas based on minimising landscape impacts alone without consideration of other potential environmental constraints". As such we welcome the reference in paragraph 4.91 "that other constraints and considerations will need to be taken into account (See Development Criteria from paragraph 4.15)." and paragraph 4.93. It may be useful to make this clearer in the wording in the Small Wind Energy Development box under Section 4.90. This could be done by example adding the following wording in italic, or similar, "Appropriately sited single Small Wind Energy Developments will be supported where there is a clear visual link, at an appropriate scale, between the wind energy development and the building/s to which it relates and the development meets the other Development Criteria for all types of wind energy development".	Amendments made to policy box as suggested.	
79.	00062	SEPA		1.8 We welcome the Further Information on Wind Energy Development section after paragraph 4.93 and note the request that any links we think should be included are provided in our representation. However while we have specific guidance on wind energy other aspects of our guidance would be applicable to other types of renewable energy developments covered in the SG. We therefore recommend you move this section to after Section 6 and retittle it 'Further Information and guidance for renewable energy	Section will be moved as suggested.	

				developments'. We would welcome the following document links being included.		
80.	00062	SEPA		<p>Please refer to the Guidance and advice notes section of the SEPA website at: http://www.Sepa.Org.Uk/environment/land/planning/guidance-and-advice-notes/. The guidance includes links to other documents which developers will need to consider. Details of those most relevant to energy developments are detailed below.</p> <p>Guidance based on specific types of development:</p> <p>LUPS-GU4 Planning guidance on on-shore windfarm developments: http://www.Sepa.Org.Uk/media/136117/planning-guidance-on-on-shore-windfarms-developments.Pdf</p> <p>LUPS-GU18 Planning guidance on hydropower developments: http://www.Sepa.Org.Uk/media/136104/planning-guidance-on-hydropower-developments.Pdf</p> <p>Fuel storage – the Control of major accident hazards (COMAH) Regulations are applicable to any establishment storing, or otherwise handling, large quantities of chemicals or substances of a hazardous nature, including production facilities, warehouses, and some distributors, for further details of the regulations see: http://www.Sepa.Org.Uk/regulations/control-of-major-accident-hazards-comah/</p>	Insert links as suggested.	
81.	00062	SEPA		<p>Topic based guidance:</p> <p>LUPS-DM-GU2c (ii) Development Management Guidance on Heat Networks and District Heating: http://www.Sepa.Org.Uk/media/219485/lups-dm-gu2c-ii-development-management-guidance-heat-networks-and-district-heating.Pdf supported by the land use planning background paper on heat networks and district heating: http://www.Sepa.Org.Uk/media/162921/lups_bp_gu2c_ii_land_use_planning_background_paper_on_heat_networks_and_district_heating.Pdf</p> <p>LUPS-GU7 Guidance on the Water Framework Directive including river basin planning: http://www.Sepa.Org.Uk/media/143208/lups-gu7-planning-guidance-on-the-water-framework-directive-including-river-basin-planning.Pdf</p> <p>LUPS-GU31 Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems: http://www.Sepa.Org.Uk/media/144266/lups-gu31-guidance-on-assessing-the-impacts-of-development-proposals-on-groundwater-abstractions-and-groundwater-dependent-terrestrial-ecosystems.Pdf</p> <p>Future sites should be assessed for flood risk from all sources in line with Scottish Planning Policy (Paragraphs 254-268). The Flood Maps for Scotland are available to view online at</p>	Insert links as suggested.	

				<p>http://www.Sepa.Org.Uk/environment/water/flooding/flood-maps/ If a flood risk is identified then a Flood Risk Assessment (FRA) should be carried out following the guidance set out in the document Technical flood risk guidance for stakeholders: http://www.Sepa.Org.Uk/media/162602/ss-nfr-p-002-technical-flood-risk-guidance-for-stakeholders.Pdf. A FRA may also be required if any engineering works proposed in the water environment are likely to result in increased flood risk to people or property. Borrow pits – see advice in LUPS-GU4 Planning guidance on on-shore windfarm developments: http://www.Sepa.Org.Uk/media/136117/planning-guidance-on-on-shore-windfarms-developments.Pdf</p>		
82.	00062	SEPA		<p>Guidance on the assessment of peat volumes, reuse of excavated peat and minimisation of waste: http://www.Sepa.Org.Uk/media/136117/planning-guidance-on-on-shore-windfarms-developments.Pdf and SEPA Regulatory Position Statement – Developments on Peat: http://www.Sepa.Org.Uk/media/156522/wst_ps_peat.Pdf</p> <p>Regulatory advice Some aspects of the proposals may require authorisation from SEPA, for example engineering works in the water environment, abstractions, exemptions from waste management. Please refer to the regulatory section of the SEPA website at http://www.Sepa.Org.Uk/regulations/. Details of The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) can be found in the CAR Practical Guide. As previously advised “any proposal to discard materials that are likely to be classed as waste would be unacceptable under current waste management licensing and under waste management licensing at time of decommissioning if a similar regulatory framework exists at that time.” So recommend including the document</p> <p>Is it waste - Understanding the definition of waste: http://www.Sepa.Org.Uk/media/154077/is_it_waste.Pdf</p> <p>If the applicant has a specific regulatory query they are advised to contact a member of SEPA’s regulatory services team in the local SEPA office at Norlantic House, Scotts Road, Hatston, Kirkwall, Orkney, KW15 1GR, Tel: 01856 871080.</p>	Insert links as suggested.	
83.	00062	SEPA		<p>Heat Networks, Energy from Waste and District Heating 1.9 We welcome the inclusion of Section 5 and note that “Specific Planning Policy Advice will be prepared for individual heat networks to provide information on heat sources, safeguarded pipe-runs and any requirements for future developments to link into the network.” We would welcome consultation on the Specific Planning Policy Advice as this is developed.</p>	Noted.	

84.	00570	Internal		Net Economic Benefit p.7 How can we quantify net economic developments independently of the information provided by the developer? Or how can we know if the information given by the developer is correct e.G. How can we assess the number of jobs and economic assessment of greenhouse gases over 25 lifespan of a WT? Or do we have to take the information submitted on face value? Have looked at "The Green Book" but it is not the easiest to read/understand! Are we to quantify in £ (e.G. Money given to the community) or general benefits (e.G. Free electricity for everyone in the parish where the WT's are located, for lifetime of the development!)	The new economic assessment submitted by the applicant will set out their argument in line with the guidance referred to. If the planning officer doubts the credibility of the information or if the benefits are not clear, further information/details should be requested.	
85.	00570	Internal		P5 Why are we proposing to consult Scottish Water on ALL applications. Certain islands have no Scottish Water network.	Scottish Water has requested to be consulted on all renewables applications.	
86.	00570	Internal		P6 link to Community Benefit Policy should be provided	Once adopted the policy will be linked.	
87.	00570	Internal		P6/7 Positive impacts: to enable the council to assess positive impacts we need to understand all impacts, I think we need to make this clear the onus is on the developer to clearly demonstrate positive and negatives to enable a balanced decision to be achieved.	This is made clear at 2.05 in the draft document.	
88.	00570	Internal		There is no mention of grid issues; obviously there is no potential for benefit given the constraints. How should applications be assessed with no solution in place to overcome the grid issue?	Information submitted by the applicant must outline how negative impacts are outweighed by benefits- this may be an off-grid solution as a device will never be built without a use for the energy.	
89.	00570	Internal		P8 2.13 I am concerned with this para. I do not think we should be putting a level (20MW) on it. I would read this as suggesting that this set a level.	This level was suggested by Government officers during the drafting of the document. An applicant could use this as an argument for over-riding negative effects only when large scales are discussed. There are other forms of mitigation/argument though.	
90.	00570	Internal		Spatial Strategy Framework p.13 The spatial strategy framework seems to be at odds with the Landscape Capacity Assessment (LCA), e.G. An area of Birsay defined as coastal hills and heath in the LCA with no capacity for WT's over 30m in height is defined as an area with potential for wind farms in the Spatial Strategy (SP1).	SPP determines what is included in the Spatial Strategy and this should only be seen as an indicative steer and not a yes/no to the suitability of development. This is made very clear at 4.11 and 4.12 of the draft document.	
91.	00570	Internal		Wind Energy Definitions p.12 Question 1 I would suggest option A the preferred definition in Table 1 with the addition that all applications should conform to the spatial framework and development criteria.	Preference noted. The document is abundantly clear that the applications must accord with both.	
92.	00570	Internal		Development Criteria p.16 – p.27 In DC1 (which refers to impacts on communities, it is felt that there should be a paragraph on separation distance from the road (overall height of the WT) for safety although it is noted that this is mentioned in 4.35 under 'Views from recognised Viewpoints...' etc on page 20. Maybe better under DC1?	Paragraph 4.35 will be moved to beneath 4.19.	
93.	00570	Internal		I think there needs to be a clear statement defining what the spatial strategy includes and what it does not, this need to be in a very simple clear form early in the document.	SP1, SP2 and SP3 make this clear.	

94.	00570	Internal		P13 4.15 The 2km separation distance is not shown within the significant protection on all villages?	It includes all town and villages in line with SPP. Other residential properties and rural settlements are preserved through Development Criteria.	
95.	00570	Internal		P16 4.20 account needs to be taken of our location in this instance, given low sun levels in winter.	The final sentence of this paragraph allows for this.	
96.	00570	Internal		P16 4.22 reference should be made to cumulative noise levels from other turbines etc.	The term "Ambient Noise Level" allows for cumulative noise to be considered.	
97.	00570	Internal		P17 4.23 "properties at their own expense" should read "properties at the developers expense"	The sentence requires developers to undertake the works at their own expense already - it begins "Planning conditions may be used that would require the Developer to....."	
98.	00570	Internal		4.24 may want to expand on the "route/timing of construction movements" as we normally require detail on weights and length of loads" might want to indicate that Roads Services may require damage to the public roads to be rectified.	Text will be amended to add this detail.	
99.	00570	Internal		Landscape and Visual Impact: aviation lighting needs to be considered within this section, has caused significant issues.	Sentence added regarding lighting.	
100	00570	Internal		P18 Table 2 Large, Very Large and Wind Farm. I would suggest given the scale the minimum distance for ZTV should be 30km	These figures have been agreed with SNH as OIC's landscape advisor.	
101	00570	Internal		P20 The main sensitive visual and landscape receptors are outlined below: I would mention landscape capacity in this section as well	There is a difference between landscape capacity and visual impact from identified receptors. Landscape capacity has its own section later in the document.	
102	00570	Internal		4.58 I think we should be mentioning socio economic impacts in this section	This is covered in 2.05.	
103	00570	Internal		4.81 I think there should be an opportunity to include 'unless otherwise agreed in writing' in the condition which would allow us to make a judgement if there is a good reason to allow it to continue beyond the year.	Text has been amended as suggested.	
104	00570	Internal		6.03 "Energy storage solutions must form part of the initial application for the renewable energy development" this may not always be possible, this statement needs to allow for this.	Text has been amended to account for this.	
105	00570	Internal		6.06 Hazardous substances may come into play and the HSE may require to be consulted it would be useful to flag this up.	New paragraph added to flag this up.	
106	00570	Internal		Additional comments: All applications should provide details of grid connection point, cables should form part of application. Issue of lack of capacity within grid needs to be addressed fully as it has a knock on effect on socio economic side. Also given no timeframe for a change, if consents are granted they may well have lapsed before the grid is upgraded. If we gave them a longer period of planning consent this could be considered as prejudicing other development in that area.	This is not a material consideration.	

107	00136	OIC Engineering		<p>Another excellent read, I wonder in terms of reference to “pipe runs” within developments we could tweak this to say “pipe runs and/or cables”. I ask as the solution technology is not necessarily pipe driven for the Heat Networks, Energy from Waste and District Heating references. (ref page 3 block A para ii) and any following references.</p>	<p>Text updated within section 5, but we cannot amend the core policy from the plan at this stage.</p>	
108	00136	OIC Engineering		<p>Just another reflection for consideration on the community benefit. That being given our somewhat unique island position and fact that we do have our own interesting in self-development, I wonder if we could be less restrictive with the anticipated community benefit? I would like to say:</p> <p>Page 6 para 1.8;</p> <p>Negotiations for community benefit payments will take place independently from the planning process and therefore sums quoted are indicative and for guidance only depending on the potential impact of development the community benefit requirement may be significantly different. Guidance is provided via the Councils “adopted Community Benefit Policy” All enquiries should be made, initially, in writing, to the Director of Development and infrastructure Services.</p>	<p>Updated text will be added, excluding the final sentence. If this is the process to be followed, it should be added Community Benefit Policy.</p>	