

## PROTECT RURAL EAST FIFE

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Thursday, 17 May 2007

Dear Sirs,

### **Public Consultation: Supplementary Guidance – Renewable Energy Technologies other than Wind Energy**

On behalf of the Protect Rural East Fife group I should like to offer our comments and recommendations on the above as follows;

With regard to the **Forward** section, in the last sentence of the 1<sup>st</sup> paragraph, it is stated that *"...we can prevent the changes but action has to be taken now"*. We doubt that it is possible to prevent the changes and would suggest wording such as *"...we can attempt to halt the effect of global warming by increasing our commitment to action now"*.

In the 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence, after the word *"lifestyle"*, we suggest adding the words *"and businesses could make changes to their operation"*. In the 3<sup>rd</sup> sentence, after the word *"Residents"* we suggest adding *"and businesses can be encouraged to employ..."*. At the end of the paragraph we suggest adding *"...thereby reducing demand and reliance on fossil fuels"*.

In the 4<sup>th</sup> paragraph, it is claimed that Fife Council support the use of renewable energy generation and in particular a minimum provision of 10% "in situ" renewable energy generation. Since the 10% target is not yet part of Fife Council's adopted policy and may be subject to change, we suggest deleting reference to the 10% target. A reference to the relevant core plan policy would suffice (i.e. subject to that policy stipulating the minimum target). We would prefer to emphasise the term 'minimum' by adding a sentence such as *"Fife Council will encourage all new development which exceeds the absolute minimum target of renewable energy generation as specified in the core plan policy"*.

With regard to content;

**Para 2.3** Refers to the UK government's white paper on energy (2003) and thereby, it is stated that a significant reduction in emissions could be achieved by 2020 by securing energy efficiency in households, industry etc. However, the means by which Fife Council might achieve this is not shown. A reference to supporting guidance on how Fife Council intend to comply with the white paper would be useful.

**Para 2.6** Refers to microgeneration/domestic scale and is supportive, in principle, of a 10% minimum embedded (on site) generation requirement. Since this paragraph follows on from the topic of solar energy generation it seems to be a limited target. We suggest widening the scope of the sentence to include all forms of microgeneration/domestic scale energy production. As above, the 10% target could be omitted and reference added to the relevant core plan policy.

**Para 6.2** Reference to the "embedded production" requirement should be consistent with para 2.6 and the Forward.

**Para 6.45** There have been many changes and developments since ETSU 1993 and it is likely that Fife has potential for technologies to use wave and tidal energy sources and reference to an outdated document seems unnecessary.

**Policy SG2** states that "They are located in areas where the coastal landscape and seascape can accommodate them" It would be useful to give a full reference to the ASH report which included a substantial part of the document on seascape.

**Policy SG3** We feel this policy should be improved by including a requirement for detailed information on how developers intend to meet the minimum target of renewable energy generation. The guidance could specify that developers should provide information which is sufficiently detailed including calculations and evidence consistent with a format which could be incorporated into this Supplementary Guidance. A caveat could stipulate that; it will not suffice for a developer to simply claim that the minimum target of energy generation has been met if, for example, the claim is supported by a simple statement such as "each house in a new development will be fitted with a solar panel".

We feel that an additional section is required to support policy SG3 and to provide the required information upon which developers could base their calculations. It would also be helpful to have a baseline of information upon which developers, businesses and others can gauge the need for prospective improvements and thereby justify their proposals in the first instance to their business leaders, financiers and the public. Businesses could be encouraged to lead the way and, in particular, the top users of energy / the biggest polluters in Fife such as Mossmorran Petrochemical plant, the Power Stations at Methil and Longannet, the Paper Mills at Glenrothes and Guardbridge, etc. could be encouraged to entertain conversions and to develop renewable energy generation.

**Policy SG4** This policy could be enhanced by emphasising that developers will be encouraged to adopt the use of renewable energy technologies in any development that they wish to bring forward. In particular, preference could be given to any new development which exceeds the absolute minimum target of renewable energy generation as specified in the relevant core plan policy.

#### **Background Papers**

We suggest references throughout the document should be made to the following  
The ASH report, PAN 45, PAN 81, SPP6: Renewable Energy,  
The Fife Landscape Character Assessment 1999 etc.

#### **Links between Draft Supplementary Planning Guidance and Core Local Plan Policies**

It would be helpful if this section could be brought forward, in front of the Background Paper section, to highlight the importance of these essential links and to provide the primary source of reference for policy and supporting information.

We appreciate the opportunity to comment and hope these comments are helpful.

Yours sincerely

Chair of PREF  
Protect Rural East Fife Group