

LDISSUE: LDMI24**Energy**

Name: **Mr Ian Angus-Felton** 02902/FLDP_MIR/3001/010

Comment:

Would like to see wind turbines in the Forth rather than the hills.

Response:

Comment noted. Onshore wind development is currently subject to detailed assessment against the Council's spatial framework and guidance, which will be revised under LDP2. Offshore developments in the Forth are identified in the Scottish Governments offshore wind farm development programme, however these are not close to Falkirk, which has a number of internationally protected ecological sites in the around the Firth Of Forth.

Comments 1

Name: **Mr James Ashe** 02761/FLDP_MIR/3001/013

Comment:

Agrees with the preferred options for energy.

Response:

Support noted.

Comments 1

Name: **M Bremner** 02919/FLDP_MIR/3001/007

Comment:

The development of the carbon capture and storage power station is not supported.

Response:

The National Planning Framework (NPF3) identifies Grangemouth as a site for a Carbon Capture and Storage development and the Plan must reflect this allocation.

Comments 1

Name: **Chemical Cluster Companies** 00878/FLDP_MIR/3002/004

Comment:

Comments on the proposed energy policy and district heating policy are reserved until further details of the policies are available. Policies should contain support for gas fired CHP plants recognising the need for a balanced energy portfolio and the needs of companies to generate onsite electricity and heat. Heat is a vital component for some industrial sites and it should be recognised that sites may not have spare capacity for any district heating network. Progress on the district heating network also needs to be made in the near future to enable companies to incorporate this into their energy planning.

Response:

The comments are noted.

Comments 1

Name: **Ms Kate Christie** 02922/FLDP_MIR/3001/011

Comment:

Insufficient information on the proposed power station in Grangemouth. Raises issues of air quality and increased major hazard risk. Use of onshore wind and district heating is supported.

Response:

Comments noted. The detail of specific energy-related proposals is not at a stage where it can be reflected in detail in the Proposed Plan.

Comments 1

Name: **Ms Sinead Currie** 02779/FLDP_MIR/3001/008

Comment:

Agree with energy options.

Response:

Comment noted.

Comments 1

Name: **Mr Douglas Dewar**

02893/FLDP_MIR/3001/011

Comment:

Definitely no fracking.

Response:

Comment noted.

Comment:

Agree with energy options outlined in MIR.

Response:

Support noted.

Comments 2

Name: **Susan Dyer**

00469/FLDP_MIR/3001/009

Comment:

I would like to see more green energy initiatives. Could the council promote its own energy from waste plant or renewable energy developments. This has been done by Nottingham City Council - Robin Hood Energy.

Response:

The points raised would be a matter for the Council's Sustainable Development & Climate Change Strategy rather than LDP2.

Comments 1

Name: **Ms Jennifer Forsyth**

02903/FLDP_MIR/3001/011

Comment:

Agree with energy options. Onshore wind and solar panels on public buildings should also be considered.

Response:

Comment noted.

Comments 1

Name: **Forth Ports Limited**

00020/FLDP_MIR/3002/004

Comment:

The allocation of the site with consent for a renewable energy plant is welcomed. The proposed consolidated energy policy is cautiously welcomed and Forth Ports would appreciate an opportunity to discuss the policy which could impact on development in the port. Further information is required on how sites will be future proofed for district heating and further details of the policy should be provided prior to the proposed plan publication.

Response:

A new energy policy sets out the criteria for the assessment of all proposals for energy development. There is also a policy on heat networks which includes a requirement to future proof sites where a heat network connection is not currently feasible.

Comments 1

Name: **Frank and Birgitta Fortune**

00907/FLDP_MIR/3001/010

Comment:

Questions the need for a power station in Grangemouth. Carbon capture is likely to prove uneconomic. Strong focus on renewable energy and energy efficiency is welcomed. A flexible, dispersed power generation approach through wind and solar, as well as investigation of ground source heat and marine heat sources for district heat should be taken.

Response:

The Vision, policies and Spatial Strategy in the Proposed Plan support the development of a renewable and low-carbon economy. The Proposed Plan reflect NPF3, which identified a site in Grangemouth for Carbon Capture, subject to detailed feasibility work. There is also current planning consent for a Biomass plant in Grangemouth. The main focus of delivery of heat works continues to be around Grangemouth, although other opportunities may arise elsewhere. Falkirk Council will be preparing a Local Heat and Energy Efficiency Action Plan (LHEES). Supplementary Guidance on Low and Zero-Carbon Development will also be prepared under LDP2.

Comments 1

Name: **Grangemouth (including Skinflats) Community Council**

02723/FLDP_MIR/3001/010

Comment:

More clarity and honesty in defining options. For district heating there are a number of questions such as will waste heat just be provided to public buildings and businesses or include housing. Who will install and maintain the distribution system, who will retrofit properties and what will the running costs be. Finally what will the fallback position be if there are technical problems. References to heat from renewable sources should define what these sources will be. If the fuel source for the CCS plant is coal local environmental impacts could be significant dependent on transportation methods and waste disposal.

Response:

Policy IR12 highlights factors in the assessment of energy proposals and Policy IR14 indicates support for district heating for new development. The plan also recognises that there is some potential in Grangemouth for surplus heat from industrial sources to be utilised. Renewable heat sources are not specifically defined but can include wind, energy from waste and biomass from wood waste.

Comments 1

Name: **Ms Sandra Hallows**

00888/FLDP_MIR/3001/010

Comment:

Agree with the preferred options for energy.

Response:

Support noted.

Comments 1

Name: **Historic Environment Scotland**

02656/FLDP_MIR/3001/042

Comment:

We support the intention to introduce a spatial framework for wind energy development, understanding that impacts on the historic environment will be assessed on a case by case basis.

Response:

Comment noted. The spatial framework can be found in LDP2, pg. 27, Map 3.7.

Comments 1

Name: **Homes For Scotland**

00284/FLDP_MIR/3002/006

Comment:

Neither householders nor developers can be compelled to use a particular energy source and district heating schemes may have viability issues. There should be no imposition of additional work on developers to consider connection to such schemes at a time when there is little information available on how the Council sees them coming forward. Potential support expressed for alternative approaches to the LZCGT policy that achieve equivalent emission reductions.

Response:

Policy IR14 Heat Networks encourages decentralised energy generation and district heating systems and major new developments should include an Energy Statement which includes an assessment of the viability of such schemes. No specific energy source is identified. Policy IR13 sets out the requirements for development to meet LZCGT targets. The requirement for this policy continues to be driven by the Climate Change (Scotland) Act.

Comments 1

Name: **Mr Roddy Htet-Khin**

00803/FLDP_MIR/3001/012

Comment:

Agree with the preferred option for dealing with energy.

Response:

Supporting comment is noted.

Comments 1

Name: **Mr Douglas Jardine**

02894/FLDP_MIR/3001/010

Comment:

Agree with Energy options.

Response:

Support noted.

Comments 1

Name: **Ms Elaine Mackie** 02895/FLDP_MIR/3001/010

Comment:

Agree with energy options.

Response:

Support noted.

Comments 1

Name: **Ms Louise Meikleham** 02920/FLDP_MIR/3001/011

Comment:

Agree with the preferred options for the issue of energy.

Response:

Support noted.

Comments 1

Name: **Miller Homes** 02869/FLDP_MIR/3001/006

Comment:

In relation to requirements arising from Section 72 of the Climate Change Act, although this is a policy requirement, the Council should continue to adopt a flexible approach to this policy by reviewing the scope of exemptions. Consistency between planning policy and Scottish Building Regulations should be established.

Response:

The policy on low and zero carbon generating technologies (LZCGT) has been carried through into the Proposed Plan. There is flexibility in the policy in that developers can identify practical or technical constraints which limit the application of LZCGT in their developments.

Comments 1

Name: **Mr Stuart Moss** 02726/FLDP_MIR/3001/010

Comment:

Agree with the preferred approach for main issue 10.

Response:

Comments noted.

Comments 1

Name: **Paths For All Partnership** 00359/FLDP_MIR/3001/009

Comment:

Transport is the second biggest contributor to Scotland's greenhouse gas emissions, yet there is no mention of it in this section. The Local Development Plan, and how it locates people, houses and jobs has a significant impact on how goods and people travel in an area. This has a consequential knock-on effect on carbon emissions. Prioritising active travel and public transport is a key to reducing this consumption. It should be identified as a Main Issue in this report.

Response:

Comment noted. LDP2 has planning policies promoting active travel. Policy PE01, for example, requires development to be designed to promote the use of active travel. Furthermore, LDP2 identifies the most appropriate land allocations after consideration of many factors, including proximity to public transport, amenities and the path network. Indeed, some sites are not supported due to their remoteness.

Comments 1

Name: **Jules Robinson** 02906/FLDP_MIR/3001/008

Comment:

There should be no further investment in carbon based energy.

Response:

Policies in the Proposed Plan seek to reduce the energy requirements of buildings, and ensure that they include embedded renewable technologies, and decentralised energy provision. The Council will be producing new Supplementary Guidance on renewable and low-carbon development.

Comments 1

Name: **Mr Peter Robinson** 02913/FLDP_MIR/3001/007

Comment:

I fully support the use of renewable forms of energy, especially solar and wave sources.

Response:

Comment noted.

Comments 1

Name: **Ms Kathryn Rosevear** 02921/FLDP_MIR/3001/009

Comment:

Agree with the preferred option for the issue of energy.

Response:

Support noted.

Comments 1

Name: **RSPB** 00977/FLDP_MIR/3001/002

Comment:

An area identified for potential windfarm development next to the Forth appears to include part of the Skinflats Reserve. This area has a similar level of constraints as adjacent areas and should be identified as an area of significant protection before it is incorporated into LDP2. See also comments on the proposed CCS plant under sites 128, 162 and 163. The preferred option for LZCGT is supported.

Response:

A small area to the north of Skinflats is identified indicatively as an area with potential for wind farming subject to detailed consideration. This classification of land reflects the requirements identified in SPP. It is noted that the Skinflats Reserve is not a designated wildlife site however ecological impact would be fully assessed against Policy PE19. The preferred option for the LZCGT policy has been carried through into the plan.

Comments 1

Name: **Scottish Natural Heritage** 00646/FLDP_MIR/3002/010

Comment:

The preferred option on heat networks is supported. Opportunities to co-locate heat networks with other networks such as green infrastructure should be considered. LDP2 should set a strong direction on heat networks at the design/masterplan stage.

Response:

Support welcomed. The approach has been set out in a new policy on heat networks within the Proposed Plan.

Comments 1

Name: **Scottish Water** 00466/FLDP_MIR/3001/002

Comment:

Proposals for wind farms, solar farms or fuel storage should be submitted to Scottish water for review to identify whether there are Drinking Water Protected Areas present which would require protection through mitigation actions. Other Scottish Water operations and assets may also be affected.

Response:

Comment noted. This is a procedural issue for the development management process.

Comments 1

Name: **SEPA (East Region)** 00532/FLDP_MIR/3002/004

Comment:

Comments on the current LDP low carbon and energy policies: D04 Low and Zero Carbon Development - support the policy but require all substantial developments to have their heat demands met by district heating and other developments to be future-proofed. RW01 Renewable Energy - support the policy but require reference to other renewable technologies and other related issues.

Response:

Comments noted and suggested amendments to LDP1 policies incorporated where appropriate into Proposed Plan policies.

Comment:

LZCGT - We would welcome a meeting with the Council to discuss issues raised by developers on why it is not practical to include LZCGT. The intention to increase the emission reduction required by policy is supported. References to the outputs of the Heat and Energy Efficiency Strategies and Regulations of District Heating should be made in the LDP as they form a critical tool of implementation.

Response:

Comment noted. Policy IR14 is supplemented by SG 14 'Renewable and Low-Carbon Development'. SG14 is to be updated, and the Council would be keen to engage with SEPA to ensure a future revised SG14 covers key matters.

Comment:

Heat networks - Strengthened coverage of heat networks is welcomed. The incorporation of district heating into major new developments is supported as this supports the Scottish Government's ambitions for the planning system to support a transformational change to allow for the provision of a low carbon economy that allows for renewable energy targets to be met. The LDP policy framework should ensure that major new developments incorporate space to be safeguarded for future pipework, pipe runs and energy centres. The policy framework should also ensure that any land required for the network is protected so that new development does not prejudice the future development of the planned heat network. Heat networks should not be limited to the areas identified in figure 6.4. The National Heat Map should be used to identify potential sources of heat and opportunities for locating other heat networks in the Council area. The biomass plant and energy from waste proposals should be required to provide input to the heat network.

Response:

LDP2 encourages the development of heat networks. Policy IR14 requires applicants to consider the potential for heat networks through submission of an energy statement. The policy states Scotland's Heat Map as a consideration to assess whether it is viable for development to connect to a heat network. The same policy safeguards piperuns within developments and also pipework to the curtilage of development as per Scottish Planning Policy requirements.

Comment:

The broadened policy approach to energy developments and the intention to consolidate the spatial framework and guidance for wind energy developments is welcomed.

Response:

Comments are noted and welcomed.

Comments 4

Name: **Stirling Council**

00617/FLDP_MIR/3001/003

Comment:

Stirling Council notes and welcomes that the SPP based Wind Energy Spatial Framework, as shown on Figure 6.3, aligns with the Stirling Framework.

Response:

Support welcomed.

Comments 1

Name: **Mr John Travers**

02905/FLDP_MIR/3001/005

Comment:

Agrees with the preferred options for energy.

Response:

Support noted.

Comments 1

Total no. of comments 35