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Response to Scottish Executive consultation on Scottish Planning Policy SPP6: Renewable Energy

Homes for Scotland represents the home building and residential development industry in Scotland. Our 90 member companies build some 95% of all new homes built for sale in Scotland. Against that background Homes for Scotland is pleased to have the opportunity to comment on the draft SPP6.

The importance of issues being addressed in the draft Planning Policy cannot be questioned from both the national and international perspectives. The advantages to the economy and to tackling the consequences of climate change are clear and UK industry has stressed the need for a partnership between government and business to deliver real progress. Homes for Scotland fully supports these objectives and the following comments should be seen in that context.

The observations that Homes for Scotland wishes to offer relate solely to paragraphs 44-46, dealing with micro-renewables. The proposals set out there have to be read in conjunction with the "Planning for Micro Renewables" Annex to Planning Advice Note 45 (Renewable Energy Technologies) which is a valuable contribution to the growing body of knowledge of the range and potential of micro-renewables.

The draft SPP6 deals only briefly with the issue of incorporating micro-renewables into new developments and is relatively unspecific about both the Executive's likely proposals and their implementation, and paragraph 46 points to "the importance of ensuring that developers fully consider (our emphasis) options for micro-renewable technologies are part of a range of energy efficiency measures to be included in new developments". We support this objective.

Without any supporting argument, however, the consultation question then goes further and indicates that the Executive is minded to make the provision of a percentage of micro-renewables mandatory for certain developments. We believe that this is premature. The time for this will come but we question whether the development industry is yet adequately experienced in the design, operational and cost issues, whether the technology is sufficiently robust and cost-effective for use in large scale housing developments, and whether there is yet sufficient customer buy-in for these technologies to be used on a significant scale in the private housebuilding sector.

It is noteworthy that trials are currently being conducted in Cheshire by a major housebuilder, with Government and research support, which will test and monitor over a two year period a range of technology and micro-renewable innovations in a number of showhomes open to the public for viewing but which are notably not for sale at this time. The rationale for this is clear and we would be happy to work with the Scottish Executive to urgently promote similar monitored trials in Scotland with its different climatic conditions and construction methods.

Without this research and appraisal and without public information and education programmes on the benefits of micro-renewables we believe, without prejudice to our support of the overall objective of reducing CO2 emissions, that it is premature to consider specific percentages of micro-renewables to be installed or the implementation arrangements. We would argue strongly that this work should have preceded consultation on the matter and should now be put in hand before decisions are reached.