

STA Scotland: Key solar asks for the Scottish Government

How the Scottish Government can pave the way for a solar transformation in Scotland

In drafting a new Energy Strategy for Scotland and to meet its 2020 100% renewable electricity target, it is clear that Scotland needs significantly more solar. The STA Scotland Asks are aimed at bridging the gap to the early 2020s when solar is expected to become one of the first subsidy free renewable technologies.

1. Put in place an ambitious **Solar Action Plan for Scotland**, for both solar PV, solar thermal and hybrid PV-thermal, and establish Scottish targets for both technologies. We suggest that a target of 2GW for solar PV and 200,000m² or 141MWh for solar thermal by 2020 are both ambitious and achievable.

Critical Asks

2. Simplify the **business rates** framework for solar in Scotland, and exempt self-owned commercial solar rooftops. Ensure that official centralised guidance in the form of a 'Practice Note' is issued to assessors to ensure clarity, consistency and fairness throughout Scotland on the interpretation of legislation on **business rates** for rooftop and ground mounted solar.
3. **Extend permitted development** to all rooftop solar PV installations, as proposed in the ongoing consultation on permitted development rights for non-domestic solar. Clear guidance should be distributed to each individual local authority building control department clarifying that Building Warrant is not required in the absence of any structural alteration to the roof, in line with the rest of the UK.
4. Put forward ambitious regulations to further decrease on-site carbon emissions from new buildings in the next round of **Scottish Building Standards** and set a clear trajectory for meeting the 2020 requirements of the Energy Performance of Buildings Directive.
5. Actively support the implementation of **energy storage** for both electricity and heat at all levels. Recognise its role in relieving pressure on the grid, extending the contribution of renewables to baseload power, and its potential to alleviate fuel poverty. Ensure solar thermal storage and space heating are permitted under the **Renewable Heat Incentive**, and that hybrid PV-thermal is also supported.
6. Address major **grid constraints** in Scotland for distributed power generation at local, regional and national level. Resolve issues surrounding new requirements for Statement of Works for even small solar rooftops. Help establish a detailed long term UK Grid Strategy that is fair and enabling for distributed power, with a control mechanism that will ensure the delivery and coordination of the collectively agreed programme of works. Engage with the National Infrastructure Commission on this issue and the move to smarter energy networks.
7. Recognise solar technologies as 'reasonable measures' within the **Energy Efficiency Standard for Social Housing (EESH) programme**. Bring forward legislation within the next Scottish Parliament to extend similar standards to the private sector within Regulations of Energy Efficiency in the Private Sector (REEPs) and include solar as a reasonable measure within this.
8. Assess the capacity and adopt an ambitious target for the rollout of solar on the **Scottish Public Estate**. The Scottish local authority estate in particular has significant potential, including public buildings, schools, leisure facilities and local authority offices. We propose a clear mandate by the

Scottish Government to direct local authorities in the development of solar installations across their portfolio.

9. Modify Scottish Building Standards so that heating systems for new homes are required to include **'solar-ready' thermal storage** (e.g. a hot water cylinder), and where existing thermal storage is replaced in existing buildings that this is with 'solar-ready' storage.
10. Ensure that the **Scottish Government Good Practice Principles** document for Shared Ownership of Onshore Renewable Energy Developments offers workable recommendations for solar and embraces the broad range of options for community investment. Adjust the Community and Renewable Energy Scheme (CARES) loans so that they are more supportive of solar projects.

Ongoing and supportive asks

11. Establish Scottish **financial support mechanisms** for all solar PV and thermal projects under the transfer of powers as set out within the Scotland Bill. This would ensure that Scotland's renewable energy mix is balanced with a sufficient amount of solar energy generation and would bridge the gap to the early 2020s when mainstream solar PV rooftops and farms can become subsidy-free.
12. Encourage UK Ministers to adopt the STA's proposal to increase capacity in the Feed-in Tariff commercial rooftop bands and remove other small barriers to deployment within the scheme.
13. Recognise the benefits of **co-locating solar, wind and storage** and sharing grid connections. Note in particular the highly complementary output characteristics of solar and wind, both when co-located and within the same broad geographical area. Ensuring the proper assessment of this effect will increase the use of existing grid assets, and allowing solar to proceed without requiring additional grid connection.
14. Introduce a Scottish replacement for the **Green Deal** covering both domestic and commercial properties that leverages available resources and empowers people to take responsibility for reducing their own carbon emissions. The programme should encompass both energy efficiency measures and renewable technologies. One option would be to vary council tax in accordance with EPC bandings, which could be combined with a scheme similar to the Green Deal.
15. Support the case to HM Treasury/HMRC that the **5% reduced rate of VAT** be retained for all domestic solar retrofit, particularly for solar thermal, roof integrated PV and renovation as part of a social policy, as per their consultation on raising this to 20%. Help push for 5% VAT for storage.
16. Mobilise the Scottish Government's representation to the EU in Brussels to push for the removal of damaging anti-dumping and anti-subsidy tariffs, and by extension the artificially high **Minimum Import Price** undertaking, on imports of PV modules and cells from China.
17. Review and update planning guidance in Scotland with regards to solar in **Conservation Areas and on Listed Buildings**. Consider extending permitted development rights within set criteria as has been done in England and Wales. Jointly develop criteria and guidance for listed buildings based on a presumption of acceptance.
18. Ensure that **planning policy and guidance for ground-mounted solar PV** provides a positive and consistent framework for deployment while protecting the environment, embracing the principles of responsible development and the [STA's 10 Commitments for Solar Farms](#)
19. Actively support **knowledge transfer** in the public and private sectors in Scotland to enable greater up-take of solar and accelerate a cost effective transition to a low carbon economy using the successful example of the NFU Renewable Development Initiative project.

Achieved

1. Make the **Energy Performance Certificate (EPC) register** for domestic and non-domestic buildings publicly available, as is the case in England. Promote its availability to raise awareness of carbon emissions and steps that can be taken to reduce them.