



Development Planning and Regeneration
East Ayrshire Council
The Johnnie Walker Bond
Kilmarnock
KA1 1HU

11 October 2017

Dear Sir/ Madam,

East Ayrshire Council supplementary planning guidance: Planning for wind energy

Scottish Renewables is the representative body for the renewable energy industry in Scotland with over 270 member organisations across all renewables technologies. The industry is playing a crucial role in the Scottish and UK Government's efforts to tackle climate change and build a thriving industry in Scotland which already supports an estimated 21,000 jobs.

Scottish Renewables welcome the opportunity to offer our feedback to the Supplementary Guidance: Planning for Wind Energy, which is an important step in shaping East Ayrshire Council's Local Development Plan.

However, we are concerned that the that the guidance and underpinning spatial framework set out by East Ayrshire council is not in line with the requirements of Scottish Planning Policy. It is our view that a number of issues in the current draft must be addressed in order to make it an appropriate and useful tool for planners, developers, land owners, communities and individuals as they contribute towards Scotland's renewable energy future.

We have set out our concerns in further detail in the attached paper.

If you have any questions on the comments set out in this response, please do not hesitate to contact me.

Yours sincerely,

Stephanie Conesa
Policy Manager- Large Scale Renewables
Scottish Renewables

Section 2: A Spatial framework for wind energy

Scale of development

The East Ayrshire spatial framework refers to turbines over 70 metres to blade tip as “large typologies,” and those between 50 and 70 metres to blade tip as “medium typologies.”

It is important to note that for a significant majority of the 7GW onshore wind pipeline in Scotland, planning applications are for an upper tip height of 125m or less above ground level. In other comparable markets such as Sweden or Germany, tip heights well in excess of 150m are the norm.

Scottish Renewables suggests the planning guidance should be updated to take into account modern turbine sizes. In its current form, the guidance is outdated and inhibits development.

Delineation of boundaries

Scottish Planning Policy sets out a clear requirement for Local Development Plans to include a Spatial Framework for onshore wind energy. The purpose of the spatial framework is to set out spatially those areas where wind energy development is likely to be most appropriate, providing a guide for developers and communities:

There is some concern however that the spatial framework for onshore wind energy does not serve this purpose for the following reasons:

There is no clear marking for Strategic Areas.

Strategic capacity areas set out in the document are not fit for purpose. Only one area, Whitelee Wind Farm, is marked as a strategic area whilst nearly half of EA is within SPP Group 3. The removal of three strategic areas (see Appendix C) have not been replaced nor have alternatives been suggested.

Landscape Sensitivity for Glen Afton is marked as High-Medium Sensitivity for 70m+, whilst the area to the north of Whitelee is also High-Medium. However it is not clear why Glen Afton is removed as a strategic area whilst Whitelee remains in.

Section 3 – Considerations to apply to all wind energy developments over 50m

Landscape and visual impacts

While we recognise that there are some benefits to Landscape Wind Capacity Studies in providing some sensitivity analysis. It is important to note that these studies do not capture the full scope or quality information that will be submitted by developers in support of proposals.

Reporters have concluded¹ that a LWCS cannot be more than a guide to the capacity of the landscape. We are therefore concerned that the decision to include the LWCS in the supplementary guidance may be seen to elevate the status of this study and it should therefore be removed.

¹ South Kyle Wind Farm Determination pages 39 – 40 - <http://www.energyconsents.scot/Default.aspx>

Wild land

It is our view that the proposed position on wild land goes beyond the requirements set out in SPP that “in areas of wild land... development may be appropriate in some circumstance.” With this in mind we would encourage East Ayrshire Council to update the current statement that “It should be demonstrated that the proposal will not have a significant adverse impact on the qualities of the wild land designation”

Carbon rich soils

The blanket restriction of the Group 2 spatial Framework Criteria in relation to peat is inappropriate. The SNH peat map (which is to be used for the preparation of Spatial Frameworks) states that the map can only indicate that carbon rich soils, deep peat and priority peatland are likely to be present, and will be helpful in the initial site selection process undertaken by developers. The caveat that more detailed site specific information may refine such areas isn't currently recognised in the draft supplementary guidance.

Effect on communities and individual dwellings

The blanket application of the group 2 spatial framework criteria in relation to the 2km separation distance is not compatible with SPP which states that “an area not exceeding 2km around cities, towns and villages identified on the local development plan with an identified settlement envelope or edge. The extent of the area will be determined by the planning authority based on landform and other features which restrict views out from the settlement.’

There is no evidence that the council has undertaken any assessment based on landform or any other features in the formation of a community separation distance and we recommend that this work is undertaken and the section is updated to comply with the requirements of SPP.

Visual impact

The proposal to require the assessment of visual effects on all residential properties within 2km is overly prescriptive and fails to recognise site specific factors – for example, a number of houses may have no visibility or one house can be a proxy for a group of houses where the effects are representative.

Cumulative impact

There is some concern with the proposal to include other land use features in the assessment of cumulative impacts. SNH guidance on assessing the cumulative impacts of onshore wind developments² sets out that:

“The purpose of a cumulative landscape and visual impact assessment (CLVIA) is to describe, visually represent and assess the ways in which a proposed windfarm would have additional impacts when considered in addition to other existing consented or proposed windfarms.”

² <http://www.snh.gov.uk/docs/A675503.pdf>

We would encourage the council to update the current proposal to reflect the recommendations of this guidance.

In light of the points above, we suggest that the Spatial Framework set out by East Ayrshire council should be revised and subject to further consultation.