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Dear Sirs,

Representation to Leaflet: 'Planning for Onshore Wind Energy'

Introduction

Jones Lang LaSalle represents SSE's renewable energy division and is pleased to submit this representation, on their behalf, in response to the above leaflet. This representation is intended as a positive contribution to assist The Highland Council (THC) with progressing the development of planning policy for the assessment of onshore wind energy development.

The Leaflet

It is clear from the leaflet that there are some questions and statements that could apply to policy development at the Highland wide level as well as other matters that apply only to Caithness. However, the status and the intention of the document is unclear and on this basis, the response provided below is in general terms and without prejudice to any further comment on formal consultation.

The leaflet poses six specific questions. Each question is addressed in turn below:

1. The spatial framework should apply to wind farms and not to small turbine groups or single machines, irrespective of height;
2. In terms of strategic capacity, we do not consider that capacity to accommodate wind farms, in landscape and visual terms, is an issue that can be determined solely through strategic planning. It is vital that individual developments are assessed on a case-by-case basis. The absolute capacity of the landscape and visual resource of a specific location to accommodate wind energy development can only be correctly determined through survey

and assessment of the potential development site. This will establish whether it may be an appropriate location for development and, if so, what scale, extent, and layout may be best accommodated on the site;

3. Policy 67 within the Highland Wide Local Development Plan does allow for a planning balance test within the policy and it may be useful to review the policy to ensure it is clearly able to assist in the delivery of low carbon energy generation;
4. There is some merit in the cluster and space approach to planning for wind energy development; however, Table 1 'Spatial Frameworks' of SPP does not expressly support this approach as part of spatial framework preparation. It is also difficult to identify conceptual areas of 'cluster and space' in strategic terms. It is site-specific survey and assessment that should determine those areas where "*further development may be most appropriate*". Additionally, the Group 1 areas in Table 1 of SPP provide a clear indication of where wind farms will not be acceptable based on an understanding of the qualities of the environment;
5. National Policy (SPP, Table 1 'Spatial Frameworks') would allow a criteria based policy approach to be developed to address cumulative considerations as set out within Group 3 of the spatial framework. As set out above at Point 2, Strategic cumulative assessment, whilst informative at the strategic scale, should not be used to replace or override the individual site-specific cumulative assessment of development proposals. In terms of the reference within Table 1 of SPP to mapping "carbon rich soils, deep peat and priority peatland habitat", addressing this at the strategic scale is of significant concern to SSE and we strongly question the workability of this. We can see merit in undertaking this at a strategic scale as an informative for developers and investors but strongly caution the use of this as a development control tool. Like the point made above regarding strategic landscape capacity, such an approach to carbon rich soils and peat should not replace development specific detailed appraisals that relate to carbon impact. For example, to demonstrate the overall carbon payback of a proposed wind energy development. The Scottish Governments Carbon Calculator provides a methodology and process for undertaking and reporting these results as part of an EIA. This approach is workable and in our view should not be replaced by regional or national mapping of soils and peat.
6. In terms of cumulative landscape considerations within Caithness and specifically the work undertaken by LUC, this is of potential interest to SSE but we are unable to comment in the whole at this time. This is due to there being little information within the document regarding the scope of the instruction to LUC, their applied methodology for undertaking the landscape assessment or the results of the assessment. To comment on conclusions relating to landscape capacity within such a large geographic area, significantly more detail on the assessment undertaken to inform the conclusions presented would be needed. We also note that the inland study area boundary of the CLVA (i.e. between Badbea in the south and Reay in the north) provides inconclusive boundaries to the four categories of 'conclusions' that are defined in the study. Whilst we appreciate that the study is intended



to cover Caithness and not the adjoining parts of Sutherland, it would be useful if boundaries were provided to the four categories shown, rather than them appearing to continue indefinitely into adjacent areas. The open nature of this edge of the four categories identified in the study may be construed as implying that areas beyond the study area boundary are also subject to the recommendations identified in the report.

I trust the above is useful in further developing the policy framework that would apply to the assessment of wind energy development proposals. There are a number of matters contained within the consultation document and above that SSE would welcome the opportunity of discussing with THC in due course. In the meantime, should you wish clarity on any matters above then please contact me directly.

With best regards,



Stuart Winter
Associate Director
Planning & Development