

From: Mathers, Martin [REDACTED]
Sent: 07 January 2015 13:17
To: devplans
Subject: Planning for Onshore Wind Energy

Please find below the response from ScottishPower Renewables to the above consultation.

1) What do you consider to be the minimum scale of onshore wind development that our spatial framework should apply to?

ScottishPower Renewables (SPR) has no comment to make on this issue.

2) Apart from the matters identified in Table 1 of SPP, what other considerations do you think we should take into account when identifying where there is strategic capacity for wind farms and areas with the greatest potential for wind development? And what information is available to help us consider those issues?

The inclusion of additional considerations would be counter to nationally-agreed policy for onshore wind as set out in SPP. This clearly lays out the criteria for identifying where there is strategic capacity for windfarms and this is accurately described in Table 1 of the Highland Council consultation paper. SPP (paragraph 161) sets out that the spatial framework should identify “those areas that are likely to be most appropriate for onshore wind farms as a guide for developers and communities, following the approach set out [in this table]” and states that “the approach to spatial framework preparation set out in the SPP should be followed in order to deliver consistency nationally and **additional constraints should not be applied at this stage** (our emphasis).”

SPP also states (paragraph 155) that development plans should seek to ensure “an area's **full potential for electricity ... from renewable sources is achieved**.”

In order to be SPP-compliant, additional considerations cannot be taken into account at the development planning stage, although of course these can be taken into account at the development management stage for an individual project.

3) What criteria do you think we should consider in deciding all applications for wind farms of different scales, including extensions and re-powering? And what information is available to help us set those criteria?

SPP gives clear guidance on this issue, introducing a presumption in favour of development that contributes to sustainable development.

The principles to support this are outlined at paragraph 29, although not all are applicable to onshore wind farms. SPR suggests that the relevant principles are as follows:

- giving due weight to net economic benefit;
- responding to economic issues, challenges and opportunities, as outlined in local economic strategies;
- supporting delivery of infrastructure - energy;
- supporting climate change mitigation;
- having regard to the principles for sustainable land use set out in the Land Use Strategy;
- protecting, enhancing and promoting access to cultural heritage, including the historic environment;
- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;
- avoiding over-development, protecting the amenity of new and existing development and considering the implications

of development for water, air and soil quality

It is the view of SPR that well located and designed windfarms make a significant contribution to sustainable development and that any guidance should make this clear.

Furthermore, SPP states (paragraph 152) that “NPF3 is clear that planning **must facilitate the transition to a low carbon economy.**”

Paragraph 169 of SPP lays out the criteria that should be applied as follows:

- net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities;
- the scale of contribution to renewable energy generation targets;
- effect on greenhouse gas emissions;
- cumulative impacts - planning authorities should be clear about likely cumulative impacts arising from all of the considerations below, recognising that in some areas the cumulative impact of existing and consented energy development may limit the capacity for further development;
- impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;
- landscape and visual impacts, including effects on wild land;
- effects on the natural heritage, including birds;
- impacts on carbon rich soils, using the carbon calculator;
- public access, including impact on long distance walking and cycling routes and scenic routes identified in the NPF;
- impacts on the historic environment, including scheduled monuments, listed buildings and their settings;
- impacts on tourism and recreation;
- impacts on aviation and defence interests and seismological recording;
- impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;
- impacts on road traffic;
- impacts on adjacent trunk roads;
- effects on hydrology, the water environment and flood risk;
- the need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration;
- opportunities for energy storage; and
- the need for a robust planning obligation to ensure that operators achieve site restoration.

SPR supports the use of these criteria, agreed within national policy.

4) Do you think that defining clusters of wind energy developments and important gaps between them is useful to help guide where further development may be most appropriate?

SPR does not believe that this is an appropriate approach as SPP has clearly set out the issues to be considered in preparing locational guidance. The appropriateness of development is assessed at project level through rigorous and comprehensive Environmental Assessment, which includes an assessment of cumulative issues. Developers consider such issues as part of the Landscape and Visual Impact Assessment process which forms an important part of the Environmental Assessment.

5) Given that national policy does not allow us to include the results of the Cumulative Landscape and Visual Assessment of Wind Energy in Caithness (the CLVA) in the spatial framework, in what ways do you think we should take it into account in our plans and guidance?

Cumulative landscape and visual impact is one of the important criteria laid out in SPP (see answer to Question 3).The CLVW, however, fails to take account of the clear presumption in favour of well-located and designed windfarms that is expressed in SPP.

Any proposed application of the CLVA by Highland Council should therefore be clearly set in this context.

6) If you have any general comments about the CLVA, please give them here:

SPR believes that the CLVA is a single issue approach which is inappropriate in the context of seeking to promote development that contributes to sustainable development. It places overemphasis on one issue while failing to take account of the clear economic and environmental advantages of onshore wind.

Thank you for this opportunity to comment prior to a formal consultation on the Highland-wide Local Development Plan (including any supplementary guidance or spatial framework).

Yours sincerely

Martin Mathers



Martin Mathers

Onshore Policy Manager

ScottishPower Renewables
Cathcart Business Park, Glasgow, G44 4BE
Tel: + [redacted]
Mob: [redacted]



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