

Issue 17	Onshore Wind Spatial Framework	
Development plan reference:	Section 7 City Region as a Low Carbon Place - Onshore Wind Spatial Framework	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Banks Group (PP12) Councillor Ralph Barker (PP30_01) Hargreaves Surface Mining Limited (PP59_02) RSPB Scotland (PP64_02)</p>		
Provision of the development plan to which the issue relates:		
<p>Onshore Wind Spatial Framework (pages 66-68) Policy 10 Delivering Heat and Electricity (page 68) Diagram 6 Onshore Wind Spatial Framework (page 67)</p>		
Planning Authority's summary of the representation(s):		
<p><u>Banks Group (PP12)</u></p> <p>In relation to onshore wind spatial framework, the representee states that it is not clear how the onshore wind spatial framework has been arrived at and suggest amendments to reflect Background Report 10 Low and Zero Carbon Generating Technologies (RSD21).</p> <p>The areas of significant protection referenced at Paragraph 7.9 (where wind energy developments will be acceptable if it can be demonstrated that any significant effects on the qualities of the area can be overcome), are not illustrated on Diagram 6, Onshore Wind Spatial Framework.</p> <p><u>Councillor Ralph Barker (PP30_01)</u></p> <p>Diagram 6 Onshore Wind Spatial Framework (page 67) is difficult to relate to actual locations. It is clear it proposes locations for potential wind farms in conflict with important landscapes previously protected. This change is unacceptable to constituents. The areas between Crawford, Elvanfoot and Leadhills, the Elvan Valley, between Leadhills and Wanlockhead, the Glengonnar Valley and the Duneaton Valley are considered extremely valuable landscapes which must be protected from wind farm developments.</p> <p>There has been insufficient public clarity and public consultation for this matter to be presented in the Proposed Plan and therefore should be removed from the Proposed Plan.</p>		

Hargreaves Surface Mining Limited (PP59 02)

With reference to Diagram 6 Onshore Wind Spatial Framework (page 67), Clydeplan should include the former Damside Surface Mine, located south of the A71 and north of the Blacklaw wind farm extension as having potential for wind farm development. The former Damside Surface Mine is a brownfield site in a rural location and, with the Blacklaw wind farm extension abutting the southern boundary to Damside, the landscape character of this area offers potential for a supplementary wind farm development. The representee refers to submitted Land Ownership map of Damside (**MAP09**).

RSPB Scotland (PP64 02)

In relation to paragraph 7.9 (page 66), RSPB Scotland request additional wording in relation to designated sites.

Diagram 6 Onshore Wind Spatial Framework (page 67) is unclear and RSPB Scotland request that designated sites (and possibly peat) are clearly mapped.

Request additional wording regarding the need for Habitats Regulations Appraisal in relation to designated sites and onshore wind in Policy 10 'Delivering Heat and Electricity'.

Modifications sought by those submitting representations:

Banks Group (PP12)

Paragraphs 7.8 and 7.9 (page 66) of the Plan should refer to Background Report 10 Low and Zero Carbon Generating Technologies.

Diagram 6 Onshore Wind Spatial Framework (page 67) should be amended to show areas of significant protection.

Councillor Ralph Barker (PP30 01)

Diagram 6 Onshore Wind Spatial Framework (page 67) should be removed from the Proposed Plan.

Hargreaves Surface Mining Limited (PP59 02)

Amend Diagram 6 Onshore Wind Spatial Framework (page 67) to include the former Damside Surface Mine as an area with potential for wind farm development.

RSPB Scotland (PP64 02)

Paragraph 7.9 (page 66) should include additional wording in relation to designated sites and those sites, including peat, should be clearly mapped on Diagram 10.

Designated sites (and possibly peat) should be clearly mapped on Diagram 6 Onshore Wind Spatial Framework (page 67).

Additional wording sought in Policy 10, Delivering Heat and Electricity (page 68) regarding the need for Habitats Regulations Appraisal in relation to designated sites and onshore wind.

Summary of responses (including reasons) by Planning Authority:

Banks Group (PP12)

Clydeplan would accept the modification to paragraph 7.8 (page 66) of the Plan as it considers this would add clarity to the Onshore Wind Spatial Framework methodology. If the Reporter is so minded, Clydeplan would suggest the following wording additions (underlined) after the last sentence of paragraph 7.8:

‘Aligned to increasing energy efficiency and reducing carbon emissions, is security of energy supply. In this context an onshore wind energy spatial framework (Diagram 6) identifies areas within the city region that are likely to be the most appropriate for onshore wind farm development. Part Two of Background Report 10 Low and Zero Carbon Generating Technologies outlines the methodology used in devising the Onshore Wind Spatial Framework illustrated in Diagram 6.’

Clydeplan would accept a modification to paragraph 7.9 (page 66) of the Plan as it considers this would add clarity to the methodology used for the Onshore Wind Spatial Framework. If the Reporter is so minded, Clydeplan would suggest the following wording additions (underlined) to the first sentence of paragraph 7.9:

‘Diagram 6 highlights the broad location of areas with potential for wind farm development within the city region. In order to protect communities and international and nationally important environmental designations and resources, the spatial framework also identifies areas of significant protection illustrated in Background Report 10 (pages 25-28). In these areas wind energy developments will only be acceptable if they can demonstrate that any significant effects on the qualities of the area can be substantially overcome by siting, design or other mitigation.’

Clydeplan does not accept the modification to amend Diagram 6, Onshore Wind Spatial Framework as it considers Diagram 6 conforms with Scottish Planning Policy by identifying locations that are likely to be most appropriate for onshore wind farms (Scottish Planning Policy, paragraph 161, page 38) and follows the approach set out in Table 1: Spatial Frameworks (Scottish Planning Policy, page 39) **(ASD01)**. Diagram 6 seeks to positively identify areas with the most potential and the least constraints for wind energy development. Adding text to highlight the Group 2 areas (from Table 1) has the potential to be perceived as offering a level of protection that is not necessarily the case (refer to Clydeplan response to PP59_02 below). Furthermore, the Group 2 Areas of Significant Protection requested by the representee are identified, described, and mapped in Background Report 10 Low and Zero Carbon Generating Technologies as follows **(ASD31)** and are essentially the areas in grey on the diagram but are not specifically identified within the legend:

- paragraphs 15.4-15.9 entitled “Group 2: Areas of significant protection” (pages 25-27);

- Map 2 National and International Constraints (page 26); and,
- Map 3 Community Separation (page 28).

Councillor Ralph Barker (PP30_01)

Clydeplan does not accept the modification as it considers Diagram 6 Onshore Wind Spatial Framework illustrates broad strategic locations within the city region that are 'likely to be the most appropriate for onshore wind development' (paragraph 7.8, page 66). In this context the approach taken by Clydeplan reflects that of Scottish Planning Policy (paragraph 161, page 38) and Table 1 Spatial Frameworks (page 39) **(ASD01)**. This allows for the protection of National Parks and National Scenic Areas, national and international designations, other nationally important mapped environmental interests and community separation for consideration of visual impact. The sites highlighted in the respondent's comments do not fall into any of the categories in Scottish Planning Policy paragraph 161 and Table 1 **(ASD01)**. They are covered by local landscape designations and Scottish Planning Policy in paragraph 169 **(ASD01)** acknowledges that landscape and visual impact is more appropriately considered through the development management process. Clydeplan therefore considers it inappropriate to protect for these sites at this strategic stage in the development plan process. Furthermore, Policy 10 Delivering Heat and Electricity clearly sets out that wind farm proposals will be subject to further consideration at the local level when other issues including landscape capacity will be taken into consideration.

Clydeplan does not accept the modification to remove the Onshore Wind Spatial Framework from the Proposed Plan on the basis of insufficient public clarity and public consultation. The Clydeplan approach to the development of an Onshore Wind Spatial Framework was subject to public consultation as part of the Main Issues Report **(ASD35)** consultation process in 2015 where it was included within Background Report 9 Wind Energy Development in Glasgow and the Clyde Valley **(ASD32)**.

Hargreaves Surface Mining Limited (PP59_02)

Clydeplan does not accept the modification as it considers its approach to the preparation of spatial frameworks for onshore wind to be in accordance with Scottish Planning Policy, paragraph 161, page 38 and related Table 1 Spatial Frameworks (page 39) **(ASD01)**.

Diagram 6, Onshore Wind Spatial Framework is indicative, as is the case with all diagrams in the Plan, and is the first stage in assessing the suitability of a location for onshore wind farm development. The next stage is undertaken within the relevant Local Development Plan and development management process and informed by site specific local knowledge of area and other evidence. The relevant Local Authority, in this case North Lanarkshire Council, will interpret the strategic framework and prepare guidance as part of the Local Development Plan process. This guidance will take account of relevant local matters including the Landscape Capacity Study for Wind Turbine Development in Glasgow and the Clyde Valley Overview Report (paragraph 5.261, page 108) **(ASD33)** and other relevant local considerations. The site put forward by the representee lies within the Plateau

Moorland Landscape Character Area. This landscape area could have medium to low sensitivity to wind turbines up to 50 metres, and potentially medium - high sensitivity to turbines measuring 50-120+ metres.

Thus the indicative nature of Diagram 6, Onshore Wind Spatial Framework does not preclude sites from wind turbine development however, it does indicate the need for detailed information at the local level. Such detailed consideration of specific sites falling outwith the 'Areas with Potential for Wind Farm Development' referenced in the key of the diagram, is a matter for the development management process in accordance with Scottish Planning Policy paragraphs 162-173 (pages 38-41) **(ASD01)**.

RSPB Scotland (PP64 02)

Clydeplan does not accept the modification to paragraph 7.9 as it considers adequate guidance is afforded to designated sites by the application of Scottish Planning Policy (paragraphs 161-163, page 38 and Table 1, page 39) **(ASD01)**. Additionally, the national and international designations, including carbon rich soils, are referred to and illustrated in paragraphs 15.1-15.10 of Background Report 10 Low and Zero Carbon Generating Technologies **(ASD31)**.

Clydeplan does not accept the modification and considers there is no need to add further information, such as designated sites and peat, to Diagram 6, Onshore Wind Spatial Framework (page 67) as the diagram is indicative and appropriate policy considerations are addressed through Policy 10 Delivering Heat and Energy which states at the final sentence the need for "further consideration at the local level" which will include other relevant designations and protections.

Clydeplan does not accept the modification as it considers the matter of designated sites and onshore wind is adequately covered in the Plan and additional wording regarding to the need for Habitats Regulations Appraisal in relation to designated sites and onshore wind is unnecessary. While the intent of the modification is noted the Proposed Plan Habitat Regulations Appraisal (page 94) **(ASD34)** states that '.....while locations are identified in the Spatial Framework, it is not known where, when or how wind energy development may be implemented, or where any potential effects may occur, or which European sites, if any, may be affected. In addition, under SPP requirements, Local Development Plans should further refine this element based on local spatial frameworks to ensure that there are no likely significant effects on any Natura 2000 sites.'

Scottish Natural Heritage has been consulted on the Proposed Plan Habitat Regulations Appraisal and is content with the conclusions of the appraisal at this stage. However, if any modifications to the Plan are proposed, it will be necessary to screen the proposed changes for the likelihood of a significant effect on the qualifying interests of Natura sites.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]