

Issue No: 16

Issue: Wind Energy: Broad Areas of Search

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Supporting documents

1. Planning Advice Note 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Wind Farms, Scottish Government, 2008 (Full)
2. Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, Background Report 11, Wind Search Areas
3. Scottish Planning Policy, The Scottish Government, 2010 (Extract) Sections 182 to 195 'Renewable Energy'
4. Wind Energy Spatial Framework: Proposed Methodology, March 2010 (Full)



GLASGOW and
the CLYDE VALLEY
strategic development
planning authority

Issue 16	Wind Energy: Broad Areas of Search	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 2 Environmental Action	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
E24 Banks Group E25 East Ayrshire Council E47 Ayrshire Joint Planning Unit E48 North Ayrshire E53/5 SRG Estates		
Provision of the development plan to which the issue relates:	Spatial Framework 2 Wind Energy (page 38) Diagram 16 (page 39)	
Planning authority's summary of the representation(s):		
<p>E24 Banks Group Welcome acknowledgement in the Strategic Development Plan of the significant potential for onshore wind energy development in the city region.</p> <p>However, the broad areas of search illustrated on Diagram 16 appear all to be focused in the south of the city region. It is considered that broad areas of search should be identified in the more northern of the city region, in addition to the areas already identified in the more southern and eastern parts.</p> <p>E25 East Ayrshire Council Object to the extent of the broad areas of search for wind energy as shown in Diagram 16.</p> <p>The broad area of search adjoins East Ayrshire at a number of locations. Of key concern, is the section of the Area of Search that is adjacent to the Muirkirk and North Lowther Uplands Special Protection Area, an internationally protected site, designated for the internationally important rare, threatened and vulnerable birds that it supports.</p> <p>Concern also is raised about the potential for conflict between the nature conservation objectives of the Special Protection Area and the development of wind turbines in this Area of Search.</p> <p>Scottish Planning Policy makes clear the need for spatial frameworks for large scale windfarms to take account of areas requiring significant protection, including those areas designated for their international natural heritage value.</p> <p>Recognising that the proposed Area of Search does not include the Special Protection Area, the Council is concerned that the Area of Search adjoins the boundary. The Council would not expect the area around the Special Protection Area to be identified as an area requiring significant protection; however, it does feel that that the boundary of the Area of Search, as it is currently drawn, is inappropriate and should be drawn back to provide some distance between the Special Protection Area and an area in which windfarms will be actively</p>		

encouraged, in order to limit any impact on the protected birds.

In addition to the particular concern relating to the Special Protection Area, there are concerns about the scale of the Area of Search, especially the section that borders East Ayrshire around Muirkirk and the A70 corridor. Given the current level of activity within this area in terms of wind farm development, it is considered that it will not be long before the capacity of the landscape to accommodate windfarm developments is reached.

It is considered that this issue of cumulative impact is not adequately addressed within the proposed Strategic Development Plan and that given that these are strategic and cross boundary issues, the Strategic Development Plan is the place for this to be addressed rather than being left to the relevant local development plans.

E47 Ayrshire Joint Planning Unit

The Strategic Development Plan Proposed Plan advocates a continuation of existing search area approach for large scale wind farms which is in line with previous plans. Given the location of these broad Areas of Search (and potential development outwith them), concerns raised previously by the Ayrshire Councils regarding issues of cumulative impact, still remain, particularly in relation to those search areas adjacent to the East Ayrshire boundary such as the Muirkirk Uplands.

Matters of cumulative impact are significant and as such need to be addressed at the strategic level through the SDP. It is unclear whether this matter has been adequately addressed.

E48 North Ayrshire Council

The Strategic Development Plan Proposed Plan advocates a continuation of the existing search area approach for large scale wind farms which are in line with previous plans. Given the location of these broad 'Areas of Search', concerns raised previously by the Ayrshire Councils regarding issues of cumulative impact still remain, particularly in relation to those search areas adjacent to the East Ayrshire boundary such as the Muirkirk Uplands. Matters of cumulative impact are significant and North Ayrshire Council objects to the Strategic Development Plan and its Strategic Environmental Assessment unless it can be demonstrated that cumulative impacts have been examined and addressed at the strategic level through the Strategic Development Plan with reference to our published Wind Farm Landscape Capacity documents and not left to resolution through Local Development Plans and/or Supplementary Guidance.

E53/5 SRG Estates

Diagram 16 of the Proposed Plan identifies broad areas of search for windfarms. These appear to be unchanged from the Main Issues Report stage. While this representation supports the designation of these areas, it is suggested that there are other areas which have been overlooked when determining the potential for windfarm development. In addition to land at Damside which lies immediately adjacent to the area of search to the south of Shotts, SRG land at Broken Cross, Poniel and parcels of the land at Dalquhandy have significant potential for windfarms as there are no specific constraints or issues which could not be easily mitigated.

Modifications sought by those submitting representations:

Amendments to Diagram 16 Wind Energy: Broad Areas of Search. In particular:

E24 Banks Group

Broad Areas of Search should be identified in the more northern parts of the city region in addition to the areas already identified in the more southern and eastern parts.

E25 East Ayrshire Council, E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council

The Areas of Search for windfarms should be reviewed, taking fully into account the Muirkirk and North Lowther SPA and the cumulative impacts of operational developments and those in the pipeline. Textual change to Strategy Support Measure 9.

E53/5 SRG Estates

The enlargement of the indicative windfarm search area (Diagram 16) to include the areas to the south of Shotts and directly to the west of Lesmahagow and Douglas i.e. to include the SRG land at Damside, Poniel, Broken Cross and Dalquhandy.

Summary of responses (including reasons) by planning authority:**General**

The Areas of Search illustrated in Diagram 16 'Wind Energy: broad areas of search' (page 39, Proposed Plan) provide an indication of where strategically significant wind energy developments of 20MW or more could be most appropriately located. These areas have been derived following the guidance set out in Planning Advice Note 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Wind Farms (Supporting Document 1) and Background Report 11 Wind Search Areas (Supporting Document 2) which outlines the methodology used by Glasgow and the Clyde Valley Strategic Development Planning Authority.

Banks Group (E24)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification. Diagram 16 provides the appropriate strategic spatial framework for wind energy. Other locations for wind energy proposals are more appropriately considered by the relevant local development planning authority, particularly in the context of landscape capacity, cumulative impact and detailed local considerations.

E25 East Ayrshire Council, E 47 Ayrshire Joint Planning Unit, E 48 North Ayrshire Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications.

- The Authority recognises the Muirkirk and North Lowther Special Protection Area as adjacent to the boundary of the broad Area of Search set out in Diagram 16. Guidance contained in Planning Advice Note 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Wind Farms (Supporting Document 1) states that there should be no 'buffer zones' around areas designated for their natural heritage

importance (paragraph 62).

- The proximity of any international or national natural heritage designation would be given due consideration if and when specific proposals come forward.
- Regarding the cumulative impacts of operational developments and those in the pipeline, The Scottish Government wishes development plans to identify those areas where there are existing wind farm developments and set out, in relation to scale and proximity of further development, the critical factors which are likely to present an eventual limit to development (Scottish Planning Policy, Supporting Document 3).
- Background Report 11 Wind Search Areas (Supporting Document 2) states *“cumulative effects may be perceived when more than one wind energy development is visible from one viewpoint, when several are seen during a journey and when there is a gradual increase in the number or size of wind farms over time. It cannot be assumed that a cumulative impact will necessarily be negative and therefore assessing cumulative landscape and visual impacts is not straightforward.”*
- Determining landscape capacity and cumulative impact requires detailed site analysis across the whole Strategic Development Plan area and in the spirit of the new Planning legislation and the culture change agenda, there is agreement between Glasgow and the Clyde Valley Strategic Development Planning Authority and its eight constituent authorities that site specific issues are the mandate of the constituent authorities.
- In this respect, it is not therefore the role of Glasgow and the Clyde Valley Strategic Development Planning Authority to determine the critical factors which are likely to present an eventual limit to development. Instead, Background Report 11(Supporting Document 2) seeks to strike an informed balance which will underpin knowledgeable detailed analyses of cumulative impact and landscape capacity at the local development plan level of the development plan system.
- In the spirit of the Scottish Planning Policy (Supporting Document 3), Planning Advice Note 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Wind Farms (Supporting Document 1) and the approach of the Glasgow and the Clyde Valley Strategic Development Planning Authority and its constituent local authorities, the analyses undertaken for Background Report 11(Supporting Document 2) largely confirms those areas where there are existing wind farms.
- This can be evidenced in Paragraphs 23-28 of Supporting Document 4 Wind Energy Spatial Framework: Proposed Methodology (March 2010). In relation to landscape capacity and cumulative impact, it devolves the analysis of critical factors which are likely to present an eventual limit to development, to individual authorities based on local circumstances.

E53/3 SRG Estates

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications.

Diagram 16 provides the appropriate strategic spatial framework for onshore wind

energy development. Individual sites for wind energy proposals are more appropriately considered by the relevant local development planning authority, particularly in the context of landscape capacity, cumulative impact and detailed local considerations.

Reporter's conclusions:

Reporter's recommendations: