



T: 0131-244-4405
E: paul.lawson@gov.scot

Email to: ldp@stirling.gov.uk

11 January 2018

Emma Fyvie
ldp@stirling.gov.uk

STIRLING COUNCIL – WIND ENERGY DEVELOPMENTS SUPPLEMENTARY GUIDANCE

I refer to your correspondence of 10 November 2017, seeking comments on Stirling Council's consultation on the above supplementary guidance.

We provide comments in the remainder of this letter. Please note, these comments are intended as guidance to improve alignment with national policy and are made without prejudice to Scottish Ministers future consideration of the Supplementary Guidance.

Wind Energy Developments

We feel that the Landscape and visual impact section dominates this guidance and that it generally reads negatively towards wind turbine development and focuses on constraints, rather than opportunities. As a result, this approach leaves Table 1 and Map 3, reading as an absolute position, which cannot be varied.

This is demonstrated in paragraph 5.23, where the potential for development complying with the typologies is still be found to be unacceptable. Whereas, no reference is made to say that the reverse is also possible (that a development not complying with the typologies may be found to be acceptable when assessed on its merits). The risk here is that the position set out, affords highly protected areas essentially the same protection as areas identified in Group 1 of the 'Table 1: Spatial Frameworks' of Scottish Planning Policy (SPP), and this would be inconsistent with



SPP. This is highlighted in paragraph 196 of SPP, which is clear that the level of protection given to local designations should not be as high as that given to international or national designations.

We recommend that the language around the treatment of the landscape study is modified, to more appropriately position the guidance it contains, for application preparation and development management purposes to the position of SPP. SPP supports the development of a diverse range of electricity generation from renewable energy technologies and guides development to appropriate locations.

Paragraph 5.24 highlights additional guidance to be applied to development proposals, but does not detail what that is, nor comment on its status. Whereas in contrast, Section D 'Guidance for extensions and re-powering of existing wind farms' brings forward a summary of the landscape study design guidance on repowering into the supplementary guidance.

It is useful to see the Council's position on repowering set out. Paragraph 5.25 refers to fewer, larger turbines in a repowering context. It would be inappropriate to expect in every instance that repowering will always involve the replacement of existing turbines with fewer, but larger turbines. It may be the case that repowering allows for greater consolidation of wind turbines, but this might not result in fewer numbers, on every potential repowered site. We therefore suggest the first sentence is amended to read: "*This may involve the replacement of existing turbines with fewer, more widely spaced and larger turbines*".

We'd also recommend considering the recently published Scottish Government's Onshore Wind Policy Statement which makes it clear that larger turbines reflect the direction of the wind turbine market direction generally, and not just for repowering. The statement can be downloaded from the Scottish Government's website: <https://beta.gov.scot/publications/onshore-wind-policy-statement-9781788515283/>.

Please contact me should you wish to discuss the above.

Yours sincerely,

Paul Lawson
Graduate Planner