#### Onshore wind planning: frequently asked questions

Some questions and answers relating to the planning of onshore wind turbine developments.

## Q: How do we know where carbon rich soils are – which maps should we use? (Scottish Planning Policy (SPP) ref: Table 1, para 205)

A: Scottish Natural Heritage (SNH) is producing a map combining carbon rich soils, deep peat and priority peatland habitats which will be issued for consultation shortly. The date will be advised. The map will be available as a shape file and a short report will explain how it has been produced. In the meantime, please contact SNH for further advice on existing sources of information.

## Q: Where does landscape capacity assessment (LCSs) fit into planning for onshore wind? (SPP ref: While SPP does not refer to LCSs, paras 169, bullets 4 and 6, and paras 202-204 are relevant)

A: Landscape capacity does not form part of the spatial frameworks for wind as defined in the SPP. However they can be supportive studies relevant to development management and for planning policy related to natural heritage and the landscape. To provide a clearer steer on development management, planning authorities may wish to undertake or update their landscape capacity studies to:

- establish a better view of local landscape sensitivities,
- identify acceptable levels of landscape change,
- identify cumulative effects and set objectives and guidance to managing those effects; and
- identify scope for further development.

Key considerations include SNH Siting and Design guidance which identifies three broad levels of cumulative change in the landscape depending on landscape sensitivity, value and local policy objectives.

The Scottish Government encourages dialogue with SNH and use of their Landscape Capacity Toolkit when preparing landscape capacity studies.

## Q: Why do development plans have to prepare spatial frameworks when the information can easily be mapped nationally? (SPP ref: Table 1)

A: The SPP is designed to be as clear and simple as possible, so that spatial frameworks can be established quickly and accurately. Most of the criteria can be easily and quickly mapped – we see this as an advantage. Planning authorities are best placed to give careful consideration to the way they define the community separation distance – applying judgement to define what is appropriate to their areas.

## Q: Is the separation distance from wind farms or wind turbines to communities? (SPP ref: Table 1, para 169, bullet 5)

A: The separation is not a ban on wind farm development in the identified area. The character of some settlements can in part be defined through their relationship with their surroundings. In some settlements this relationship is more important than in others. The separation distance allows for the important vistas out from a settlement that could be harmed by an insensitively sited or designed wind farm to be identified. Within identified areas wind farm proposals can be expected to have the visual impact on the character of the settlement considered in fine detail particularly from important vistas.

The intended outcome is a greater emphasis being placed on sensitive design of wind farms located in the separation areas.

The community separation distance is not designed to address matters that will be considered at development management stage, for example noise and shadow flicker.

### Q: Is the separation distance a minimum or maximum? (SPP ref: Table 1, para 169, bullet 5)

A: SPP states that separation distances within spatial frameworks should be identified not exceeding 2km.

The separation is not a ban on wind farm development in the identified area.

## Q: How should planning authorities go about defining community separation distances to include in spatial frameworks? (SPP ref: Table 1, para 169, bullet 5)

A: Planning authorities can use any method they consider appropriate.

A circle around defined settlements may give the starting point for identifying the community separation areas. This could then be refined further by considering issues such as:

- accurately mapping the boundaries (sometimes knows as the settlement 'envelope') of cities towns and villages identified in the local development plan (LDP); settlements with no defined boundaries in the LDP should not be included
- map a 2km area beyond the boundary line
- consider local topography for example are there landscape features such as hills or ridgelines close to or within the settlement that are likely to block outward views from key public spaces or buildings?
- consider the landscape character of settlements as defined by its surroundings – for example is the settlement built on a flat open landscape, contained within a river valley, on undulating terrain or on the coast? Are there important views from the public spaces within the settlement, particularly where there are built heritage features or historic townscape skylines for consideration of visual and character impact? Such as conservation areas,

- long main streets or some elevated open spaces where townscapes could be affected
- the layout and built form of settlements for example are there large industrial areas on the periphery of the settlement that might limit potential visual impacts of wind farm development? Are there tall buildings or particular built forms that limit outward views? What direction are important public buildings orientated that are likely to have views beyond the settlement limits? Are there particular views outward from residential areas or key civic/public areas that could impact on the perceived character of the settlement?

# Q: Should Strategic Development Plans (SDP) prepare spatial frameworks for wind – won't this just duplicate Local Development Plans (LDP) frameworks? (SPP ref; para 162)

A: We would expect SDPs to take a pragmatic and strategic perspective in planning for wind energy – SPP states they should: identify where there is strategic capacity for wind farms, and areas with greatest potential for wind development, considering cross-boundary constraints and opportunities. However, we appreciate it may not be useful to map some aspects, such as community separation distance other than indicatively, at a strategic level.

SDPs are well placed to bring together spatial frameworks within their constituent LDPs and to consider them collectively. A number of planning authorities within SDP areas will have carried out supportive studies. They will be aware of pressures for development. The SDP can identify strategic priorities that LDPs may need to consider further, for example:

- repowering opportunities,
- where constraints may have changed, potentially freeing up an area for development,
- where environmental designations span multiple authority boundaries,
- where operating or consented wind farms may limit new development and
- where existing wind turbines or wind farms may not be of a scale that makes best use of the wind resource.

Like many other planning considerations, this is an opportunity for planning authorities to work together within the context of the SDP to identify and address cross-boundary issues.

Q: SPP para 162 states: "Both strategic and local development planning authorities, working together where required, should identify where there is strategic capacity for wind farms, and areas with the greatest potential for wind development, considering cross-boundary constraints and opportunities." Does that refer to the process set out in Table 1, or is this asking planning authorities to map something in addition? (SPP ref: para 162)

A: Areas of strategic capacity are essentially Group 3 areas from the spatial framework, largely free from group 1 and clusters of group 2 constraints. They may lie across SDPA and LDPA boundaries which is why planning authorities should work together. They are areas where it may be desirable to restrict smaller-scale

wind turbines to allow larger wind turbines/farms to come forward, for example through a safeguarding policy that optimises new opportunities. They may include places where large-scale wind farms are already deployed. They might also be areas where large-scale wind farm repowering may be prioritised. Paragraph 162 is not to be used to define individual wind farms as strategic.

The use of landscape capacity studies may assist in identifying areas with additional capacity at particular scales and for the management of cumulative impact. Development management considerations will still apply in strategic capacity areas so it is not envisaged that those areas would be fully built out but that they will provide a supportive policy framework and a steer for the development industry.

Q: How can planning authorities be clear about likely cumulative impacts and recognise that in some areas the cumulative impact of existing and consented energy development may limit capacity for further development? (SPP ref: para 169 bullet 4, 174)

A: Cumulative assessments, landscape capacity studies and visual impact assessments can assist in:

- 1. defining the baseline wind turbine landscape typology from operating and consented wind turbines in their area;
- 2. identifying potential limits/thresholds of acceptable cumulative change expressed in SNH guidance;
- 3. setting aims or objectives to define how areas could be developed out in order to keep within an acceptable level of cumulative change within the lifetime of the plan;
- 4. informing strategic or local planning policies and/or supplementary guidance; reviewing the capacity situation when drafting next plan.

Such studies should not be used to constrain the spatial framework, but can be used to assist decision-making at development management stage.

#### Q: What is meant by 'use in perpetuity'? (SPP ref: para 170)

#### A: Permanent use.

Even where an individual wind farm proposal may have an operational life span specified by condition the site should be suitable for use as a wind farm in other respects. The identification of an operational lifespan, commonly spanning 25 years for wind turbines, should not be used as a mitigation for negative impacts arising from the operation of the wind turbine. This is to ensure that developments which will be in place for an inter-generational length of time are appropriately sited and designed to have acceptable impacts.

The permanent suitability of a site for wind farm use is important as it has a relationship to the potential repowering of a site and the expectation that a wind farm in use today will in principle be acceptable in the long term if reconfigured.

Identifying sites that are suitable for permanent use is important to ensure that we not only meet our targets for renewable electricity generation but can sustain them in the future.

Q: The SPP doesn't emphasise the need for planning authorities to work with the renewables industry when developing local onshore wind strategies – do you not want us to do that anymore?

A: Opportunities should be taken by industry and all other stakeholders to provide comments to planning authorities on Main Issues Reports and proposed Local Development Plans.

### Q: How would mitigation (of wind farm proposals) address impacts on wild land? (SPP ref: Table 1, paras 200, 215)

A: Mitigation could include reducing the number of turbines, careful siting and design of the proposal. Limiting the visibility of the proposal through understanding of the geographical features of the area and through comments received during the design, scoping and engagement stages of wind farm development could also help to identify the scope for development.

Table 1 of SPP relates only to wind farms. Paragraph 200 of SPP sets out the general approach to development in areas identified by the 2014 SNH map of wild areas. Both parts of SPP work together and should not be read in isolation.

Q: Does 'areas of wild land' refer to the SNH 2014 Wild Land Areas, or does it refer to areas where 'wild land character is displayed' (paragraph 200)? Does 'wild land character' refer to wildness more broadly, or only to the 'wild land areas' on the SNH 2014 map? (SPP ref: para 200, 215)

A: It refers specifically to the SNH map of wild land areas. Paragraph 200 merely acts as a descriptor of the general characteristics of wild land.

## Q: In Group 1 (National Scenic Areas and National Parks), does 'wind farms' mean any wind turbines? Is there a definition? (SPP ref: para 161, Table 1)

A: The SPP does not define a wind farm but footnote 68 refers to a description derived from the Loch Lomond and The Trossachs and Cairngorms national parks. The definition in SNH guidance is that a wind farm is a group of more than three turbines. Paragraph 161 in SPP is clear that spatial frameworks should identify those areas that are likely to be most appropriate for onshore wind farms. Group 1 areas are not acceptable locations for wind farms.

SPP paragraph 161 is clear that individual development plans should identify the scale of wind farm to which their spatial framework applies.

We are aware of smaller single wind turbine developments within National Parks that have been considered acceptable. We continue to support the right development in the right location.

Q: Does 'scenic routes' only refer to the A9 and A82 as shown on page 41 of NPF3, or does it apply more widely? (SPP ref: para 169)

A: Scenic routes are currently those identified in NPF3.

Q: Does the reference to the carbon calculator refer to all applications, not just those determined under S36 of the Electricity Act 1989? (SPP ref: para 169)

A: Yes.

Q: The SPP refers to 'mobile' energy storage: what is this? (SPP ref: para 168)

A: To date this has typically involved shipping container-scale units that contain a supply of energy and which can be transported to areas of demand as required. SPP Paragraph 168 supports this.

Industrial sites / brownfield sites could accommodate 'mobile' energy storage units for use in the event of power outages, increasing resilience to power intermittency and/or temporary electricity shortages. A recent example occurred in Arran in winter 2013.

The Scottish Government is to develop an energy strategy and policy options concerning energy storage. Researchers have been appointed to prepare a literature review of current studies on the subject which should help inform future guidance.