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LIS RESPONSE TO SPATIAL PLANNING FOR ONSHORE WIND TURBINES: NATURAL HERITAGE CONSIDERATIONS GUIDANCE CONSULTATION DRAFT
CONTRIBUTED TO SCOTTISH NATURAL HERITAGE – 24.04.2015

LIS Response

The Landscape Institute Scotland is part of the chartered institute in the United Kingdom for landscape architects, incorporating designers, managers and scientists concerned with conserving and enhancing the environment.

The LI is an educational charity and chartered body whose purpose is to protect, conserve and enhance the natural and built environment for the benefit of the public. The LI is committed to the principles of sustainable development by improving the quality of design of urban and rural environments and to the protection of our physical and natural environments.

The LI's Scottish Branch (LIS) represents the professional membership within Scotland and is particularly concerned with design, management and planning for the protection, conservation and enhancement of the natural and built environment of Scotland.

Many members have experience of providing landscape advice to developers, local authorities and statutory consultees on site selection, siting, design, landscape and visual impact assessment, construction and research into the built effects of development proposals including wind farms. Members work in the public sector, private sector and the voluntary sector. Therefore, LIS welcomes the opportunity to respond on behalf of members to this consultation on the draft guidance for Spatial Planning of Onshore Wind Turbines which has been designed especially for local authorities, but also for use by other stakeholders.

Our comments are as follows:

- The guidance makes no reference to the potential repowering of existing onshore wind farm sites, and how Planning Authorities may take account of this potential development in emerging and future Development Plans;
- Repowering is particular pertinent given the statement in SPP that 'Areas identified for wind farms should be suitable for use in perpetuity.' (SPP, para. 170);
- 'Our Role' Page 3 – states 'good development in the right places' the use of the word 'good' would appear out of place here and is potentially too emotive? 'Appropriate development'? (The use of SPP para 15. – 'the right development in the right place' may be more appropriate);
- Para 1.6.2 – Bullet 4 – 'general design, turbine height and layout' – without having consideration of the potential form/scale of turbines likely to be proposed for repowering, capacity studies risk being dated at their time of publication, relying on unrealistic/unviable technologies (i.e. this is already evident in some areas of Scotland where capacity studies limit the size of turbines at 80-100m, even in areas where development of a larger scale has been deemed to be successfully integrated into the landscape);
- Box 2 – Factors relating to capacity for windfarms - this would seem an appropriate place to emphasise the role which more strategic masterplanning of areas which may be subject to continued wind farm development (either through the addition of new development or the

Landscape Institute Scotland, 15 Rutland Square, Edinburgh EH1 2BE

repowering of existing wind farm developments). Advocating a 'joint up' approach by developers and local authorities (especially where cross border development and effects occur) could help ensure a more consistent and planned image of wind farm development in those areas – in accordance with 'Areas identified for wind farms should be suitable for use in perpetuity.' (SPP, para. 170);

- Minor comment – 'wind farms' / 'windfarms' is used interchangeably throughout the document. A consistent approach, alongside that used in other SNH wind farm guidance would be useful;
- Table B: Cumulative Impacts – progress towards a comprehensive mapped dataset of wind farm development/potential development in Scotland will be a very useful tool for decision makers/stakeholders and the general public. Is there a timescale for the publication of this and how frequently will the dataset/database be updated?
- 'Landscape Objectives' – Particular reference should be made under 'Landscape Change' to future repowering of onshore wind farms, as although a site or wider landscape may be capable of accommodating the existing scale of development, future repowering with potentially much larger turbines in some locations may not always be appropriate and may lead to unacceptable landscape change. Emphasis on the principles of Siting and Designing Wind Farms in the Landscape Guidance (SNH, 2014) is welcomed, but this guidance in itself has very little reference to repowering and the challenges which may lie ahead.
- Paragraph 1.4 – Community Separation Distance – It is suggested that this 'distance' is not too prescriptive even though we appreciate that this consideration is not only for landscape and visual amenity reasons, as noise and vibration issues can affect communities too, especially if they are 'downwind' of turbines. However as for landscape and visual amenity matters we would suggest that 2km should only be a guide, as some settlements/ communities may well be located within 2km of proposed turbines and experience no visibility or visual amenity effects from a development due to local topography etc.

LIS is overall supportive of the contents of this draft guidance for Spatial Planning for Wind Turbines. We understand this guidance is intended and needed to assist local authorities who are required by the SPP to prepare such spatial plans and supporting documents which should enable further rigour and robustness in responding to early stage proposals and lodged applications, and for others considering proposing wind turbine developments. With regard to landscape and visual amenity resources that may be affected by future wind turbine development proposals, either strategically or cumulatively, LIS believes that such spatial planning documents will be extremely useful for all concerned.

We note that as repowering of existing schemes is increasingly becoming a new dimension of existing developments, with often increased scales of structures potentially resulting in possible changes to existing landscape and visual amenity effects of wind turbines. We therefore urge that the guidance takes this into account at the earliest opportunity. We would be happy to comment on any further or final drafts of this guidance.

Landscape Institute Scotland, 15 Rutland Square, Edinburgh EH1 2BE