

Response from the British Wind Energy Association the Ayrshire Joint Structure Plan Consultation Draft.

The British Wind Energy Association (BWEA) welcomes the opportunity to respond to the draft strategy and provides this submission on behalf of the UK wind energy industry.

BWEA was established in 1978 and is the representative body for companies active in the UK wind energy market. Its membership has grown rapidly over recent years and now stands at 323 companies, including 98.8% of all grid-connected wind energy now installed and every company with a lease to develop offshore (see our online Company Directory at www.bwea.com/members/GenericList.asp).

In representing the wind industry, BWEA is in a unique position to comment on the circumstances which affect the future growth and development of the sector. BWEA would be pleased to clarify any issues raised and offer any further information which may be required.

Thank you for the opportunity to comment on the draft joint structure plan, if you have any queries please do not hesitate to contact BWEA

With regard to Policy parts 2.38 – 4.11, and Strategic Policy 1 of the consultation draft, BWEA have the following comments:

Responses to consultation questions

Question 17 'How can timber resources and the timber industry be promoted?'

The timber sector will have another potential market by developing a long term and sustainable biomass industry. There is a need to establish a supply chain, processing plants and medium sized (around 20MW) generating plant. In the short term forestry waste can be used in co-firing with coal in power stations but one consideration must be that the further from a plant the 'green' fuel source is, the less renewable the generation (in fact technically biomass is not carbon neutral because of the need to transport and build plant whereas wind energy pays back the CO₂ used in its construction within 6 months of its operation starting).

Question 18 'How can Strategic Policy facilitate renewable energy systems to ensure that they act as an economic and sustainable driver for rural communities'

Attracting inward investment of renewable energy systems depends on both the local resource and local planning framework. The local planning framework should be positive and proactive, to secure inward investment and development in the first instance. The content of the policy could also provide brief guidance on benefits. For example:

- Use of local labour, materials and businesses where possible
- Identification of potential benefits for a proposal, both financial and other related benefits (educational resources, security of energy supply, habitat management)

- Any financial benefits/funds (that should reasonably relate to renewable energy/energy efficiency) to be managed by a body decided by the community
- Community consultation on how funds are spent, to ensure they are distributed in an equitable way
- Any possible community investment and ownership opportunities in wind farm to be considered (recognising that these opportunities may be limited depending on the funding scheme of the windfarm).

In addition to positive planning policy, the Council could consider developing a renewable energy strategy to become an exemplar in this sector. A strategy could outline local goals and aspirations, how renewable energy investment will be attracted into Ayrshire, how networks will be made between the Council, developers, investors, environmental groups, the community and other stakeholders to promote and maximise renewable energy opportunities, and outline funding and investment opportunities. The development of a renewable strategy should not result in delays for existing and forthcoming renewable energy planning applications.

Question 19 'Two potential areas for commercial wind farm development have been identified, are these areas suitable? Should further areas be identified? What constraining factors do you envisage to future wind farm development?'

a) Are the two identified areas suitable

The two identified areas appear suitable except that that they are very small and exclude a number of proposed wind farm developments. The small size of these areas also leads to a situation where existing proposed developments that do lie within the identified areas will limit any further development, other than extensions – there will be limited scope for any new schemes. For this reason BWEA objects to the identified areas as they currently stand. This point is discussed further below.

b) Should further areas be identified?

The two preferred areas that have been identified are small compared to the entire Ayrshire area, particularly when it is considered that the Joint Structure Plan (JSP) will be in force until 2025, and it is not stated how these preferred areas have been chosen following the landscape character study. For a variety of reasons these areas could fail or not be feasible for developers, whilst there will be a presumption against development outside of the preferred areas.

The LUC 2004 wind farm landscape capacity study¹ identifies areas of landscape type suitable for wind farm development; one of these (the Dalmellington area) is not included as a preferred wind farm area in the consultative draft. The Dalmellington area currently has a large wind farm proposal, and is identified in the study as suitable, yet not included on the grounds that would impact on Glasgow Prestwick International Airport, however the Ayrshire consultative draft Structure Plan Technical Report 3 states that wind farms are guided in a manner to take account of landscape sensitivity, intervisibility and local resident population. If the Dalmellington area has been identified as suitable on landscape grounds it should be included. This landscape area is also deemed suitable for wind farms within the 1998 Scottish Natural Heritage (SNH) Ayrshire Landscape Assessment². It is for developers to then

¹ Ayrshire and Clyde Valley Windfarm Landscape Capacity Study, Land Use Consultants March 2004

² Land Use Consultants (1998) *Ayrshire landscape assessment*. No 111. Scottish Natural Heritage, Edinburgh.

consult with the airport and CAA to ensure any potential impacts can be mitigated. It is foreseeable that there will be technical solutions to any potential impact on Glasgow Prestwick Airport in the short to medium term.

Similarly, with respect to a current proposal near Afton – this area is not included as preferred yet it is directly adjacent to land in Dumfries & Galloway, which already has wind farm development (Windy Standard). Furthermore, with respect to this area, the 1998 Ayrshire Landscape Assessment by Land Use Consultants on behalf of SNH (para 5.227) reads as follows:-

'It is likely that large parts of the southern uplands have potential for wind power development, though this is likely to be constrained to some extent by the availability of connections into the power distribution system. All other things being equal, it would be logical to steer wind farm development to those parts of the southern uplands already affected by forestry or other developments.'

Again, another proposal in Chalmerston is in an area of similar land type to the consented wind farm at Hadyard Hill, and identified as an area that SNH would seek to steer wind farms towards, yet this area is left out of the 2 identified areas for wind farms in the JSP. Hare Hill wind farm is also consented but not included in the identified areas for wind farms. These areas are excluded by the JSP as potential wind farm development areas, despite already containing consented and operational wind farms; this will constrain any new development, current proposed schemes and extensions to existing wind farms and amounts to a restrictive policy.

The Joint Structure Plan has therefore excluded a significant number of proposed wind farms, which have been subject to a great deal of work and investment. These proposals are in areas that have been deemed as suitable for wind farm development by SNH. NPPG6 states that local plan policies for renewable energy developments should safeguard, where appropriate, areas with potential for renewable energy projects. The JSP does not make reference to the 1998 SNH Landscape Assessment study or the Framework Document for Windfarm Development Proposals within Clyde Muirshiel Regional Park (Draft August 2003) – both these documents are relevant and would be useful in identifying preferred wind farm areas for the purpose of the JSP.

A large wind farm in Ayrshire could make a significant contribution to meeting renewable energy targets locally, and is the recommended approach in the LUC 2004 Study, however there has been no consultation to achieve a consensus on whether this necessarily is the best approach. It is emphasised that the suitability of either a small number of large schemes or numerous small schemes is an open debate, and planning policy should not place restrictions on different types of proposals, whether small or large.

It should also be highlighted that open cast coal mining brownfield sites could be used for wind turbine developments. Wind farm developments can bring associated benefits such as landscaping, habitat management and regeneration to derelict sites. A Lanarkshire site, Black Law Wind Farm, is an example of this. It is recommended that brownfield/ex-industrial sites be included in preferred/non-restricted areas – section 2.38 of the JSP points out that much of the land in Ayrshire has been degraded and requires renewal.

With the lifespan of the plan until 2025 it is important that renewable energy development, of which wind is currently the most technologically and economically placed to meet targets, is not restricted by limited areas of search. In consideration of all the above points it is strongly recommended that the preferred wind farm areas are significantly increased or removed entirely and replaced with clear criteria based policy that would in itself provide guidance on acceptable locations for wind farms. If areas of search are going to be pursued BWEA suggests either of two options: a) identify preferred, neutral and restricted areas, with an emphasis on criteria based planning policy to determine proposals, or b) identify a small number of only the most restricted areas, with planning policy criteria guiding location outside the restricted areas, although this is perhaps the least suitable option as the nature of the restriction could change before 2025.

c) What constraining factors do you envisage to future wind farm development?

Future constraining factors will change over the course of the JSP period. Factors considered as constraints at the moment are likely to be resolved in the future, such as aviation/radar or in some places grid, whilst new constraints may arise. As mentioned above, the areas of search that have been proposed will be a constraining factor to 2025; a broad and long-term approach is needed with respect to wind farm development.

Question 20 Response

It would be recommended that the Ayrshire JSP contacts the Forum for Renewable Energy Development in Scotland via the Scottish Renewables Forum for advice on delivering this concept. The concept of identifying an area where biomass activity can be concentrated is valid. In terms of community benefit this could be the supply of energy through heat networks like district heating schemes or installation of domestic scale CHP boilers or wood chip burners. There may also be the opportunity to provide biofuels and biogases for local use in transport, etc. Also, such a scheme would promote rural economic diversity and jobs at a time when agriculture is facing constraints. The key is to have a supply chain delivering raw material to a processing plant that can supply end users in close proximity to each other.

Question 21 Response

The Ayrshire JSP should seriously consider promoting wind energy and other renewable developments as potential tourism attractions. All the evidence suggests that tourists find wind farms and hydro schemes interesting points on the tourist trail (500,000 people visited Pitlochry Power Station last year). In addition, evidence suggests that once built local people and Scots out with Ayrshire would travel to see a wind farm or other kind of scheme. Lastly, Ayrshire authorities should assess the potential for each scheme proposed in its area and encourage developers to improve amenity on sites. At present many areas in Scotland could be opened up to tourism following the development of wind farms and other renewable technologies.

Other comments

The consultative draft does not state that proposals outside the preferred areas will be considered, as required by NPPG6. It is recommended that an additional sentence is included, confirming that applications outside the preferred areas will be

considered equally, and on their own merits to those in preferred areas. There are no criteria against which to assess wind farm proposals outside of the two preferred areas of search, as required by NPPG6. As previously mentioned, it is recommended that criteria based approach is adopted.

With regard to specific policy sections, BWEA has the following comments:

2.38-2.45 Supporting Rural Communities: renewable energy developments can help deliver the aims of this policy (as recognised in 3.34), particularly in diversification of the rural economy. This policy section might want to recognise that farmers have the need to diversify income sources, and renewable energy developments are a significant of achieving this.

2.58 This section could effectively place a moratorium on wind farm development in the vicinity of Glasgow Prestwick International Airport (GPIA) to protect its future expansion. It is not considered that such an approach is necessary as it is likely that technical solutions to problems will be available in the short to medium term. It is therefore important that this area is not excluded from wind farm development for the duration of the JSP.

3.35 The policy states that a significant expansion of wind farms is needed to meet 2010 and 2020 renewable electricity targets at a local level, yet there is not considered sufficient capacity in the landscape to absorb such development; it is not stated how this conclusion has been arrived at. Is the conclusion that Ayrshire cannot meet 2020 targets locally because the required amount of wind energy development is not acceptable in the landscape? The LUC study concludes that the study area is unable to accommodate the level of modelled development without incurring significant landscape and visual impacts (page 9). The level of modelled development is for 800 turbines (p37) – this far exceeds what Ayrshire could be expected to accommodate for 2020 targets and beyond! It is reasonable to expect that 80% of the 2020 target will be met by wind energy, equivalent to 126 additional 2.5MW turbines. Landscape capacity should be modelled on this much more realistic projection – there is every reason to believe that Ayrshire can meet 80% of 2020 targets with wind energy development - a single proposal for a large wind farm could easily meet 80% of the 2020 target - indeed Ayrshire could exceed 2020 targets if a small number of large wind farms proposals were permitted (as recommended in the LUC study, p9). The conclusion that Ayrshire cannot meet 2020 targets locally must be scrutinised if it is to be used as a policy basis for the Structure Plan until 2025. If this conclusion has been based on the LUC study, then the study should be subject to consultation and review, to ensure consensus is reached with other stakeholders.

3.36 The policy states that wind farm locations must not be at the expense of the environment. This statement lacks clarity, and the premise that wind farms have a negative impact on the environment (especially visual) is subjective; wind farms benefit the environment with respect to reducing the need for fossil fuel, and therefore tackling climate change, acid rain etc. There are also local environmental benefits such as landscaping and associated habitat management schemes. It must also be considered that all types of renewable energy development are likely to have some kind of effect on the surroundings – wind energy should not be singled out

here. For example biomass schemes raise issues on health and traffic grounds. It is recommended the word 'environment' be replaced with a more specific description of what is meant (perhaps 'landscape'), and the policy should instead refer to a balance of considerations, for example along the lines: *'...there is an onus to find wind farm locations that would contribute to the overall national supply, this should be balanced with local landscape considerations.'*

3.37 BWEA supports community involvement and this point is supported. Community ownership opportunities for commercial wind turbine projects could also be mentioned here.

3.38 This sentence should be removed; renewable energy developers and the market are best placed to decide what types of renewable energy developments will be feasible. All types of renewable energy development must be encouraged; planning policy should not prescribe which are most suitable. NPPG6 states: *'Planning policies that rule out or place fundamental constraints on the development of all or specific types of renewable energy technologies will be inappropriate without sufficient reasoned justification.'* It is not considered that the Ayrshire SP Consultative Draft gives sufficient justification for placing a preference on other renewable energy technologies than wind.

3.39 The response to 3.38 applies here also – the market should decide. Attempts to promote biomass generation by Ayrshire Council area welcomed, however the draft policy creates an unsustainable either/or situation between biomass and wind, when all renewables should be equally encouraged. The strength of the biomass industry is currently being studied through the Scottish Executive's Forum for Renewables Energy Development, the Biomass Energy Group is due to report in October. It is likely to conclude that a significant contribution is not expected from biomass until after 2010 (please contact Scottish Renewables Forum if more information is required on this issue). If the Ayrshire JSP intends to develop a viable biomass sector in Ayrshire it is important to ascertain progress so far: what is the current level of developer interest for plant, processing facility and supply chain? What are the likely contributions based on this interest to the 2010 target?

4.11 This paragraph is supported and welcomed.