

Mr Ian Johnson
Manager - Ayrshire Joint Structure Plan & Transportation Committee
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by email (postal copy to follow)

Thursday, 26th August 2004

Dear Mr Johnson,

Comments on the Ayrshire Joint Structure Plan Consultation Draft

Thank you for the opportunity to comment on the draft joint structure plan for Ayrshire.

We would firstly like to express support for the response you will have received to the consultation from the British Wind Energy Association, which broadly represents the views of E.ON-UK Renewables Limited. E.ON-UK Renewables Limited are one of the UK's leading renewable energy companies with broad experience of developing and operating renewable energy assets across the UK in the wind, hydro and biomass fields.

We feel the need to respond separately to emphasise our opinions regarding Question 19 of the consultation letter. This question relates to the issue of "Preferred Areas" for commercial wind farm development.

The recognition of the importance of developing renewable energy resources and the inclusion of specific policy to guide commercial wind farm development within the JSP is appreciated. The areas suggested would appear to be suitable areas of search for wind farm development.

We believe that the guidance, in its current form, could restrict the development to the full potential of acceptable wind energy utilisation within Ayrshire.

Generally, we feel that the use of preferred areas, which we acknowledge has been suggested and used in other area structure plans, is often not the most straightforward approach. A carefully considered criteria-based approach is often more flexible and can provide better guidance to developers, planning and development personnel and the public. A criteria based approach is often essential in tandem with any "search areas"

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approach to aid the consideration of any proposals that fall within the preferred areas. This is essential to ensure that unacceptable proposals are filtered out.

It is also currently unclear exactly how schemes outside of the designated preferred areas would be dealt with. We would suggest that, should a preferred areas approach be utilised, that there is a concise policy to apply to potential wind farm developments in areas outside of the identified preferred areas. Given the methods used to identify the current preferred areas there should be a recognition that there may be individual sites outside of the preferred areas that may be as, or indeed better, suited for a wind farm.

If a "search areas" approach is followed, we feel that recent landscape capacity studies suggest that an additional area, close to the Afton Valley and the existing Windy Standard wind farm should be included in the preferred areas. We have laid out the detailed reasoning behind our opinion in the attached document.

Once again we thank you for the opportunity to comment and hope that the above is useful. If you have any queries regarding the above please contact Vaughan Weighill of E.ON at the address / telephone number above.

Yours sincerely

David Farrier
Development Manager
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REASONING FOR INCLUSION OF ADDITIONAL "PREFERRED AREAS" OR CRITERIA BASED APPROACH.

The preferred areas indicated in themselves would seem to offer scope for wind farm development to be appropriately located simply on the basis of landscape character and potential visibility per head of population. This is a useful by but no means exhaustive basis to establish wind farm policy.

The recent landscape capacity study¹ points out:

'The study considers only the landscape and visual factors associated with wind farm development. It does not take account of other factors such as recreation, habitats and species, cultural heritage, grid connections or land ownership.' (Capacity Study para 0.6)

In other words, only two out of a number of criteria have been considered in general terms by the landscape capacity study. This fact together with the other 'health warnings' (see Capacity Study paras 1.9 - 1.21) suggest that the capacity study cannot be sensibly applied as sole determinant of wind farm location policy and that a criteria based approach is necessary.

Further, it must also be the case that since:

'...while the results of the present study are useful in comparing different parts of the study area, they should not be used to consider single windfarms in isolation. More local landscape capacity studies, together with landscape and visual assessment are required for this.' (Capacity Study para 0.6)

This suggests that there may well be locations outwith the 'preferred zones' which are perfectly capable of accommodating wind farm development - subject to meeting appropriate criteria - criteria which may, in certain circumstances, rule out wind farm development within the preferred zones. This general point is reinforced when considering the following statement:

'It is important that the results should be used to provide a broad comparison of different parts of the study area, rather than an absolute measurement of particular locations' suitability for windfarm development.' (Capacity Study para 0.6)

Given the above, it is relevant to consider two main themes / options:

- A) whether or not there should be additional areas flagged as preferred areas of search; and
- B) the criteria based approach.

¹ Ayrshire and Clyde Valley Wind Farm Landscape Capacity Study, LUC 2002

A) Further Preferred Areas

Based on the reasoning set out in the capacity study, it is suggested that there is at least one further area that should be included as a potential area of search. That area is the Southern Uplands/Upland Valley area in the vicinity of the present Windy Standard Wind Farm. The reasoning is as follows:

1. The higher level landscape displays the same general character and broader mix of sensitivity, value and visibility per head of population as the preferred areas.
2. It is an extensive area able to accommodate wind farm development.
3. It has been subject to a specific locational analysis (Site 57 - Grouping 'K') which performs exceptionally well in terms of the capacity study (Site 57 is the 8th 'best scoring location out of 115 in terms of landscape and has '0%' of the total population within 5 km).
4. The measures of 'sensitivity' for the Upland Glen landscape type at Afton Reservoir may have been incorrectly shown on Figure 4.1 (shown as 'Higher' sensitivity when Appendix 1, Table A1-1 places it into the 'Medium' category running into 'Lower' sensitivity at the upper level.).
5. Concerning landscape value as disaggregated in Appendix 1, Table 1-2, when detailed consideration is given to the Afton Reservoir area i.e. the southern section of the Upland Glen, it is clear that with respect to remoteness and wild land qualities, it may well be regarded as less sensitive than 'medium' given the plantations, reservoir and water treatment works. In terms of quality/intactness, rather than a score of '3' - higher sensitivity, '1' may have been more appropriate given the access track to the Windy Standard Wind Farm, the presence of the wind farm above the valley floor, the plantations, reservoir and water treatment works. As such, it would have been more appropriate to place the southern section (at least) of this unit and the western flanking upper slopes in the lower sensitivity category.
6. The commended performance of Windy Standard: *'The analysis indicated that existing wind farms (particularly Windy Standard) perform relatively well.'* (Capacity Study para 0.14)
7. Finally, it should be noted that the LUC/Ayrshire Councils/SNH landscape assessment (1998) stated in connection with the Upland Glen type:

'...modern development in these valleys is limited. The principal exception is the water infrastructure associated with the Afton Reservoir. This has a modern industrial appearance that contrasts with the character of the surrounding, upland landscape.' (Ayrshire Landscape Assessment, para 5.154) It is noted of course that it is also stated: *'the intimate scale and distinctive largely undeveloped upland character means that tall structures located within or visible from these glens would have a significant influence on landscape character. They should therefore be discouraged.'* (Ayrshire Landscape Assessment, para 5.155)

There is no doubt that this would be particularly relevant to Glen Tig but, given the presence of the existing Windy Standard Wind Farm and the largely accepted proposed Extension, the relevance to Glen Afton in its southern section must be much less relevant.

Accordingly, it is reasonable to suggest that at least one other preferred area should be identified in Ayrshire i.e. the Southern Uplands/Upland Glen Area in the vicinity of the existing Windy Standard development.

B) The Criteria Based Approach

It is clear that the capacity study paves the way for comparing broad-scale parts of the wider landscape. What is also clear is that the preferred areas cannot in themselves be regarded as areas to be specifically promoted without further caveat e.g. with a view to safeguarding other environmental elements e.g. habitats, species, cultural elements/landscapes.

If it remains the intention to promote 'preferred areas' based on the capacity study, then there must be a clear and unequivocal recognition that there may well be other equally or better suited locations for individual wind farm development subject to meeting such criteria as may be deemed appropriate.

Accordingly, it would be more appropriate to have a criteria based policy in place to apply generally before directing attention to specific parts of the landscape. If the second stage is to direct attention to specific areas, then either (a) the number of areas should be increased to accommodate (as a minimum) the Windy Standard - Afton area or (b) an explicit statement should be made to demonstrate that wind farm development in other areas would also be supported provided the criteria based approach is met.

Further Consideration

There is a further line of reasoning that suggests the landscape between the existing Windy Standard Wind Farm and the Afton Reservoir should be 'preferred' in general terms and is suitable in more specific terms.

It is clear that the existing wind farm at Windy Standard performs well (see para 7, 6th bullet point above). Further, test site 57 is reasonably close to Windy Standard i.e. on the boundary between Ayrshire and Dumfries and Galloway - above Afton Reservoir and within Group 'K'.

It is also clear that, in testing various development scenarios, *'The results demonstrate the potential benefits of a planned approach based on a smaller number of larger windfarms over one based on a larger number of smaller wind farms. A key conclusion therefore, is that, irrespective of the level of development ultimately achieved within the study area, a planned approach, based on a smaller number of larger windfarms will help reduce the overall level of landscape and visual impact.'* (Capacity Study para 0.28)

It is acknowledged that the existing and proposed Windy Standard developments are located in Dumfries and Galloway. Equally however, the importance of the relationship between the two areas (Ayrshire and Dumfries & Galloway) has been freely acknowledged by carrying out the 'buffer' studies within the overall Capacity Study. The confluence of landscape suitability, visual suitability, existing performance of the Windy Standard Wind Farm as well as its locally characterising presence in any event (noting also the nearby presence of Hare Hill), the industrial character in part of the Upland Glen, all suggests that 'the planned approach' could be sensibly and appropriately brought to fruition in the landscape between the existing wind farm and the Afton Reservoir valley.