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Dear Sirs,

**Re: Response from Hunterston Hydrogen Limited to the Ayrshire Joint Structure Plan Consultation Draft.**

As a company with plans to develop wind and hydrogen projects in Ayrshire, we welcome the opportunity to participate in your consultation. In general we concur with the response of the British Wind Energy Association, although some of our views do differ as seen below.

We have the following comments to make on the Policy parts 3.34 - 3.40, and Strategic Policy 1 of the consultation draft:

Responses to consultation questions

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

Renewable energy developments, especially those involving clean hydrogen production, should be viewed as business activities that will become more commonplace over the coming years. As with all business activities, they will act in their own right as an economic and sustainable driver for rural communities if allowed to flourish in Ayrshire. We are at the beginning of a new era in power generation involving all renewables, energy storage technologies and clean fuel delivery. This has a positive implication for all areas that embrace the opportunity.

The Strategic Policy could enhance sustainability in rural communities by allowing aggregations of smaller landowners to circumvent the costly process of Environmental Impact Assessment, especially for smaller developments, say less than 10 MW or 5 individual machines.

It is also important that the Council beware of consulting with nation-wide developers. Only the larger organisations can afford the manpower and costs associated with such consultations, thereby ensuring that the smaller (and often local) developers are left unheard.

The Strategic Policy, in its present form tends to (we believe erroneously) isolate renewable energy from other economic and business activities. Our own plans for a significant infrastructure of hydrogen electricity balancing systems could have implications for employment in towns such as Kilbirnie, Irvine and Saltcoats – towns identified as being in the investment corridors defined in the Ayrshire Joint Structure Plan. These towns have the facilities and work-force necessary to operate the services that will be closely associated with renewable energy generation and energy storage in their respective areas.

If Ayrshire Council recognises that renewable energy developments add value to the locality and the nation, in much the same way as other businesses and services, then the local planning framework should be positive and proactive, to secure inward investment and development in the first instance.

**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?’**

In principle, we are opposed to this form of zoning as it is unlikely that the Ayrshire Council will be aware of **ALL** the constraints and limitations involved with renewable and wind energy development. Moreover, it creates an artificial presumption against developments outside these areas, creating an artificial “land rush” amongst developers that can foster high levels of local objections in those areas. A more useful exercise might be to have a more transparent system of “filters” that does not rely on one subjective criterion – such as landscape. These filters could, for example, be based on;

- Which areas are left to developers when all dwellings are surrounded by a 500 m exclusion zone (noise limit)?
- Which areas are left to developers outside statutory designations?
- Which areas are available to developers within 5 km of 33, 66 or 132 kV distribution networks?
- Which areas are available to developers within 5 km of 400 kV transmission networks?

**a) Are the two identified areas suitable (developer responses)?**

We have no objective measure of the suitability of these two areas, as we are not aware of any publicly available documentation or reports detailing the methodology used in their selection.

**b) Should further areas be identified?**

No areas should be identified. The preferred methodology would be to identify the objective criteria by which developments would be allowed. Given these criteria, developers would then be obliged to select appropriate sites.

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

The areas identified for wind energy in the consultation document could well become a significant constraint on development. If implemented, they could create a conception in the minds of authorities that there is a presumption against wind developments outside these areas.

If these areas are adopted then the Strategic Policy should state unambiguously that applications outside of the two preferred areas will be considered equally based on their own merits, and largely using the same criteria as compared to those in the “preferred” area.

**Other comments**

With regard to specific policy sections, we adopt and agree with the BWEA on all the following points:

**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 perhaps lacks clarity; 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 associated habitat management schemes. The word 'environment' should 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.

Yours sincerely,



Declan Pritchard  
Director