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RES UK & Ireland Limited
3rd Floor, STV, Pacific Quay
Glasgow G51 1PQ, United Kingdom
[redacted]

Plans & Research Team
Scottish Borders Council
Council Headquarters
Newtown St. Boswells
Scottish Borders
TD6 0SA

Our Ref: RRL-004535

3 March 2014

Dear Sirs,

Re: Scottish Borders Proposed Local Development Plan

RES is one of the world's leading independent renewable energy developers with operations across Europe, North America and Asia-Pacific. A privately-owned British company with over 117 staff in Scotland, it has developed more than 135 wind farms worldwide over 30 years. In the UK alone, RES currently has more than 1,000 Megawatts (MW) of wind energy either constructed, under construction or consented. From its Glasgow base, RES has developed eleven wind farms in Scotland with a total generation capacity of nearly 215 MW.

RES is a market leader with strong environmental, engineering and commercial credentials and has actively engaged in supporting the development of the renewable energy sector in the UK and abroad. Engaging with stakeholders, statutory authorities and policy makers is an important part of RES's business model both at a project and a national level and as such RES welcome the opportunity to contribute towards Scottish Borders Council's Proposed Local Development Plan (LDP).

Chapter 2: Meeting the challenges for the Scottish Borders

RES welcomes the issue of Climate Change as one of the five key challenges to be faced within the Scottish Borders over the lifetime of the emerging local development plan. In particular within paragraph 2.18 the acknowledgement that the encouragement of renewable energy is seen to be a key part of the Government's response to climate change and that this also supports the Scottish Borders Council's emphasis towards a low carbon economy.

The Council further contend however, that due to the potential for adverse and cumulative impact from wind turbines a precautionary approach has been adopted to further onshore wind energy development using landscape capacity as a measure to inform this approach. There is no national planning guidance support for any such precautionary approach, indeed Scottish Planning Policy (SPP) confirms planning authorities should support wind farms in appropriate locations, and that spatial frameworks directing such development should be set out in development plans. Further detailed guidance is provided in SPP, and the relevant online renewable guidance, on how such matters should be achieved. Nothing within this policy guidance suggests the use of landscape capacity as a methodology for such a precautionary approach.

If the Council wish to avoid unacceptable impacts, including cumulative impacts, they should propose clear and concise generic development policies together with a spatial framework developed in cognisance with national guidance as a basis to their development management function. Such an approach would be supportive of onshore wind development in accordance with national policy, but would still safeguard against inappropriate development. **For the reasons outlined RES strongly objects to the Council's approach to onshore wind energy development and the use of landscape capacity to inform this approach.**

RES would further guard against the Council's reliance on offshore energy to meet the Scottish Government's renewable energy generation targets, and in turn climate change reduction. While offshore renewable energy projects are rightly promoted by Scottish Government, offshore technologies' maturity and cost may preclude significant generation contributions to the 2020 targets. As highlighted in RES' response to the consultation on the Main Issues Report to the emerging LDP (dated 9th May 2012) sufficient offshore development is unlikely to be achieved in time to meet the 100% target in 2020. Onshore wind energy development is currently the most advanced, cost effective and quickest way to achieve these national targets and accordingly the emerging LDP is required to be more positive regarding the support for onshore wind energy development. **RES requests that Paragraph 2.18 is reworded to recognise the contribution that onshore wind energy development has made and can continue to make in achieving the key climate change outcome, as part of a mix of other more established and emerging renewable technologies, in achieving a sustainable and secure mix of future energy generation.**

Key Outcome 10 within Chapter 2 requires the wording to be amended through the deletion of the word *"only"* and the insertion of the word "*unacceptable*" to provide a less restrictive and negative stance to renewable energy development. **RES therefore would request Key Outcome 10 to be reworded as follows: "Key Outcome 10: The encouragement of renewable energy in sustainable locations where unacceptable adverse potential cumulative impact can be avoided."**

RES would further contend that the valuable contribution of renewable energy development in supporting the rural economy and providing better energy security to businesses should be made within the section relating to the Key Issue of the Economy. Inward investment in often more remote rural areas, from wind farm development in particular, can significantly benefit local economies by the provision of jobs and use of local services during the construction stage of development. Renewable energy will also provide more energy security with resultant economic benefits to business and industry and social benefits to residents. **An acknowledgment of this contribution as suggested in our above mentioned response to the MIR, under the Heading "Vision" should be made within the Economy Key Issue in Chapter 2.**

Chapter 4 : Local Development Plan Policies

Policy PMD1 : Sustainability

At paragraph 1.1 in this policy it acknowledges that the LDP is founded on the premise of supporting and encouraging sustainable development in accordance with the Council's Environmental Strategy and the need for action on climate change. Paragraph 37 of SPP recognises that in order to achieve a reduction in greenhouse gas emissions, the planning system in terms of decision making should reduce energy consumption and promote renewable energy generation opportunities.

Policy PMD1 requires that in decision making and the preparation of development briefs the stated sustainability criteria should be adhered to. Criteria (e) requires the efficient use of energy and resources, particularly non-renewable resources, but does not go beyond this to lend support to the incorporation of renewable energy generation opportunities within development. As highlighted above SPP clearly states that in terms of sustainability, both the reduction in energy consumption and the promotion of renewable energy should be used to achieve sustainability. **RES would therefore require further wording to support renewable energy development in accordance with SPP to be added to Policy PMD1 and would suggest the wording in criteria (e) of the policy be reworded as follows: *" e) The efficient use of energy and resources, particularly non-renewable resources and the promotion of renewable energy development opportunities where practicable."***

Policy ED 9 : Renewable Energy Development

RENEWABLE ENERGY DEVELOPMENTS

Policy ED9 confirms support for all scales and forms of renewable energy development provided they can be accommodated without unacceptable impacts on the environment and that the siting, scale and design of all development should take account of the social, economic and environmental context.

The policy then confirms that unacceptable adverse natural heritage impacts must be fully mitigated, whilst impacts upon recreational and tourism, population, community and access routes must be satisfactorily mitigated. The justification for such a sequential approach is unclear and certainly not advocated through Scottish Planning Policy, or guidance on Environmental Impact Assessment (EIA). The Scottish Borders existing development plan policy on Renewable Energy Development (D4) requires satisfactory mitigation for all environmental factors and does not differentiate, requiring some factors to be fully mitigated. It is therefore unclear what has changed in terms of assessment, or national policy for such a further restriction to be proposed in the replacement policy within the emerging development plan. **RES strongly object to this policy wording and requests that the wording be rebalanced to provide equal weighting to the satisfactory mitigation of all unacceptable environmental impacts.**

The policy thereafter confirms if there are judged to be significant adverse impacts that cannot be mitigated, the development will only be approved if the Council is satisfied that the wider economic and environmental benefits outweigh the potential damage to the environment, or to tourism and recreation. It is wholly unjustified to included reference to damage to tourism and recreation within this policy. Such a reference pre-judges that such development will potentially damage tourism and recreation interests in the Scottish Borders. Previous and more recent studies by VisitScotland (2012) confirm that wind farm development has a very limited impact on tourism and it is unclear why Scottish Borders Council consider this to be of a particular concern for their area. Whitelee Wind Farm on Eaglesham Moor south of Glasgow, has had over 300,000 visitors since it opened in 2009 and as such acts as an important recreational and tourist attraction for this area. The Scottish Borders Council "Public Survey on Attitudes toward Wind Energy" (researchresource; December 2012) confirms that only 30% of respondents agreed that wind turbines in the Scottish Borders have a negative impact on tourism, and 57% disagreed. The Council's own research therefore reinforces the national view, rather than taking a different more localised view. **On the basis that there is no justification for prejudging that renewable energy development will damage tourism and recreation in the Scottish Borders RES strongly object to the inclusion of this reference and request it is omitted. The paragraph for the avoidance of doubt should be worded *"If there are judged to be significant adverse impacts that cannot be mitigated, the development will only be approved if the Council is satisfied that the contribution to wider economic and environmental benefits outweighs any such identified adverse impact."***

WIND TURBINE PROPOSALS

Circular 6/2013: Development Planning confirms that Local Development Plans should be concise, map-based documents making use of plain language and a range graphical techniques to convey the strategy and individual policies and proposals in an accessible way. *(para. 79)* It further confirms that planning authorities should be able to demonstrate the underlying reasons for their preferred development locations and policies. In addition minor proposals and detailed policies may be removed to Supplementary Guidance, especially if no change from the previous plan and provided an appropriate context remains in the plan itself.

It is with the above guidance in mind RES consider the substantial section of Policy ED9 relating to Wind Turbine Proposals is unacceptable. Scottish Planning Policy (SPP) states that planning authorities should set out in their development plan a spatial framework for onshore wind farms of over 20MW generating capacity, but may incorporate those of less than 20MW if considered appropriate. It is recognised that Policy ED9 contains the Council's Spatial Framework in the form of Figure ED9a, as explained within paragraph 1.7 of the policy justification. However to those not having read the justification is not clear from reading of the policy in isolation that Figure ED9a is the Council's Spatial Framework. The inclusion of Figures ED9b-ED9e relating to Wind Turbine Development Capacity Opportunities and Constraints and Landscape Capacity for three separate turbine typologies (height banding) is particularly confusing. Such figures do not merit

inclusion in the LDP as a policy consideration, but in accordance with the aforementioned Circular, if considered relevant, could be included within Supplementary Guidance as further guidance to Policy ED9.

As an example of the inconsistency and inappropriateness of the three maps with landscape capacity and height typology, map ED9c confirms most of the Scottish Borders has only a low capacity to accommodate a turbine up to 50 high, conversely the other two maps ED9 d & e indicate that in certain defined areas within the same landscape character designations turbines of up to 100m high and over 100m high would be acceptable. It would seem to suggest that in some landscape character types much taller structures are more acceptable than lower ones. This is very unlikely to be true, if a landscape can accommodate a very tall structure without it being overdominant, surely it can similarly accommodate lower structures with potentially lesser prominence within the landscape. The Council's reliance on height typology and landscape character as a basis for this policy is therefore indefensible.

Furthermore the reliance of turbine height banding in isolation as an indicator of acceptability for a landscape to accommodate development in policy terms, is not justified in terms of SPP guidance. Other factors such as scale, design and the particular topography of an area would require equal consideration. Such matters are for consideration as part of the development management process. SPP and the Government's online renewables advice on the "Process for Preparing Spatial Frameworks for Wind Farms" is very clear on what criteria should be used to develop a spatial framework and that the aim of the framework is to direct development to appropriate areas. If Figures ED9a-e are taken together it leaves very little scope for larger scale wind farm development within the Scottish Borders.

RES would reiterate their objection from August 2011 in response to the Council's consultation on their Supplementary Planning Guidance and Spatial Strategy in that the spatial strategy is overly restrictive, specifically in relation to buffers and set back distances applied to both international and national designations and roads respectively. The application of such zones within Areas for Significant Protection (Constraint as referred to by the Council) are discouraged within paragraph 190 of SPP.

As highlighted in the above mentioned response cognisance has not been taken by the Council of all development constraints in terms of the preparation of their spatial strategy. In particular they indicate areas of search which would potentially not be suitable for wind energy development due to poor wind speeds. More proactive engagement with all stakeholders during the preparation of their SPG, or subsequently during the emerging LDP would have resulted in a spatial framework which acted as a useful tool to direct onshore wind development within the Scottish Borders.

The inclusion of Figure ED9b is particularly confusing as it indicates areas of turbine development opportunity and constraints, but on the map and key, references capacity levels. It is again solely reliant upon landscape capacity issues taking an aggregate view of Figures ED9c,d & e and adding cumulative impact from approved turbine applications. This figure then suggests areas whereby limited capacity exists, but when cross referenced against the spatial strategy such areas are within areas of significant constraint due to special national, or international landuse designations.

RES therefore strongly object to the inclusion of Figures ED9b, ED9c, ED9d and ED9e within Policy ED9 and request that these are omitted. In accordance with SPP a single figure relating to a spatial framework should be included within the LDP, but based purely on the criteria as advised by SPP and the Government's online guidance for the preparation of such frameworks. Accordingly all buffers around national and international landuse designations and those around main transport corridors should be removed from the proposed spatial strategy to make it consistent with national planning policy guidance.

The additional criteria contained within Policy ED9 for Wind Turbine proposals would be better suited to Supplementary Guidance. RES would have little objection to most of the specified criteria being contained in Supplementary Guidance as these are matters that would be considered by the development management process, but consider that the detailed criteria contained within Policy ED9 makes it cumbersome and difficult to interpret. Therefore in its current form it would not be consistent with the guidance in Circular

6/2013. It is assumed that within the *Visual Impact* section within the final sentence of the first point, the reference should be to development, rather than developer?

RES object to the inclusion of the listed criteria within Policy ED9 in relation to wind turbine development as it is overly detailed for policy provision and should be removed to relevant Supplementary Guidance that the Council have confirmed they will prepare.

On the basis that the detailed criteria within Policy ED9 is not removed into subsequent LDP Supplementary Guidance and then separately consulted upon as required by the development planning process, we would wish to make the following objections:

Landscape

The third bullet point under this section refers to adverse impacts on wild land, but provides no definition of what is meant by "wild land" and as such the criteria provides little clarity in this respect. Should it be referencing the potential wild land areas as described by SNH then this should be clarified in the policy. **In the absence of such clarity on what is meant by "wild land" RES would strongly object to the inclusion of this criteria within the policy and request it is duly omitted.**

Visual Impact

It is unclear what this criteria defines as a minimal impact on a sensitive receptor, nor does it define what constitutes a sensitive receptor in terms of designation of national, or international importance. Accordingly it provides insufficient clarity as to the Council's requirements for acceptability of visual impact. If a sensitive receptor is considered to be a locally designated landscape, or as suggested one that is just prominent then minimal impact would be overly restrictive to development and as such would not result in a supportive stance to the policy as required by SPP. **We strongly object to the use of the word "minimal" and request it be removed from this criteria and replaced with the word "significant"**

OTHER RENEWABLE ENERGY DEVELOPMENT

Within this section of Policy ED9 it confirms that small scale or domestic renewable energy developments, including single turbines will be encouraged where they can be satisfactorily accommodated into their surroundings, in accordance with the protection of residential amenity and the historic and natural environment. It is unclear as to the reference of single turbine if this relates to a wind turbine, as the previous section within the policy relating to Wind Turbine Proposals confirms it relates to **all** wind turbine proposals and is significantly more detailed. The confusion as to how Policy ED9 relates to such development is unhelpful.

In conclusion RES consider that a more concise policy focussing on the key issues to be addressed by renewable energy development in the Scottish Borders and referencing a single Spatial Framework for onshore wind energy development in accordance with SPP should be included within the LDP. This would provide a clearer indication of the matters the Council consider relevant and provide both developers and communities with greater certainty.

Policy ED 10: Protection of Prime Quality Agricultural Land and Carbon Rich Soils

Whilst the protection of both prime quality agricultural land and carbon rich soils within the emerging local development plan is to be expected, it is inappropriate to link the safeguarding of both within a single policy. The permanent loss of prime quality agricultural land has primarily economic implications whilst the loss of carbon rich soils as outlined in the justification to the policy has implications for climate change. As illustrated in Figure ED10 there is very little overlap with the location of carbon rich soils being located within areas of prime quality agricultural landuse.

The provisions of Policy ED10 are appropriate to safeguarding the substantial loss of prime quality agricultural land, however whilst criteria (a) and (b) may be appropriate to the safeguarding of carbon rich soil, criteria (c) would result in an overly restrictive stance to development within such areas. Such a stance to other non-existing rural businesses or larger scale of development is wholly unwarranted in terms of the

protection of carbon rich soils in terms of climate change and may adversely impact on the economic development of some areas within the Scottish Borders. SPP at para. 133 confirms that *"the disturbance of some soils, particularly peat may lead to the release of stored carbon, contributing to greenhouse gas emissions. Where peat and other carbon rich soils are present, applicants should assess the likely effects associated with any development work."* The Scottish Environment Protection Agency have published extensive guidance on this matter which can be taken account of as part of the development management process. Other related policies such as ED9 on renewable energy already contain such considerations as part of their criteria guidance and it is not necessary to duplicate the safeguarding of carbon rich soil within other policies.

RES strongly object to the inclusion of the wording "And Carbon Rich Soils" within the title of policy ED10 and the wording "or significant carbon rich soil reserves, particularly peat," within the policy and request it be omitted. On the basis this wording is omitted and the policy relates solely to the protection of Prime Quality Agricultural Land, RES would have no objections to Policy ED10, nor criteria (a), (b) or (c) for assessment as proposed.

<u>Policy IS10: Waste Management Facilities</u>

Policy ED9 confirms that proposals for waste to energy schemes involving human, farm and domestic waste, such as Anaerobic Digestion, will be assessed against Policy IS10 Waste Management Facilities, rather than as a form of renewable energy under Policy ED9. Anaerobic Digestion is an on-site energy solution for some businesses, in particular the agricultural and food industries, rather than purely a solution to dispose of waste in a more sustainable way.

We welcome the recognition of waste to energy schemes and have no contention with the criteria listed for consideration in Policy IS10: Waste Management Facilities. However the fact that renewable energy is subsequently generated is not afforded any significant weight in terms of this policy, as it should to be in accordance with SPP. It should further be recognised that such facilities are currently an immature market, but one that is likely to grow during the lifetime of the proposed LDP, given the emerging environmental policy environment. **It is suggested that the Council make a direct reference to waste to energy schemes in Policy IS10 in terms of a positive balance for such schemes and a commitment within the policy justification to provide further more detailed guidance for such schemes in the proposed Supplementary Guidance on Waste Management.**

RES trust the above comments and objections in respect of the proposed Local Development Plan are of assistance and are given due consideration by the Council in preparing the plan for adoption.

Yours sincerely,

[redacted]

Carolyn Wilson MRTPI
Development Project Manager
E Carolyn.Wilson@res-ltd.com
[redacted]

Encl. Copy of RES response to MIR for Local Development Plan (dated 9th May 2012)
Copy of RES response to SPG (dated 11th August 2011)

RES UK & Ireland Limited
3rd Floor, STV, Pacific Quay
Glasgow G51 1PQ, United Kingdom
[redacted]

Mr. Charles Johnston
Planning Department
Scottish Borders Council
Newtown St Boswells
Melrose
TD6 0SA

Our Ref: 01711-000348

11 August 2010

Dear Mr Johnston,

Re: Response to Scottish Borders Supplementary Planning Guidance (SPG) Consultation exercise

Whilst RES acknowledge the relatively large amount of wind farms to date that have been consented and constructed within Scottish Borders it is clear that further development will be required in order to move towards the national targets. As such RES welcome the draft spatial guidance and are supportive of the process followed in relation to the SPG and much of the text which is in line with national policy.

However, certain parts of the guidance depart from guidance offered in SPP and PAN45 and generally, are not supportive to wind energy development. For this reason we must **object** to the SPG in its current form.

The absence of any Broad Areas of Search (BAS) is the most obvious exclusion on first read of the SBC SPG. The use of varying levels of constraints rather than BAS gives an initially restrictive first impression particularly when the Area of Least Constraint (green area) forms such a small area it is difficult to actually see on first view of the A4 spatial strategy map. As such RES see the draft strategy as appearing initially restrictive and not encouraging to future development.

The list of constraints to wind energy development in Figures 10, 12 and 13 are almost all, as stated in PAN45, "***constraints that in themselves should not lead to restrictions on development***" yet these constraints appear either on their own or in combination the reason behind the apparent lack of development potential for wind farms. These constraints fit into the following categories.

1. Figure 10 contains the areas that constitute the *Areas of Constraint with Significant Protection* (red areas). According to SPP these protection areas should not carry buffers or set backs over and above the original size of the protected area as they appear to do now through being shown on an area coloured red and termed *Area of Significant Protection*. ***As such the red areas should, at most, constitute the original area of, for example, the Ramsaar site but there is also a strong argument for removing these national and international designations as all wind farm developers will consider these areas through the natural process of site selection.***

2. Figure 12 identifies visually sensitive transport corridors which were highlighted in the Borders Landscape Character Assessment. As the SPG notes: *"It identifies the areas that are vulnerable to sequential impact by identifying all Landscape Character Areas (LCAs) that are assessed as having a high external intervisibility or a high visual sensitivity but to restrict the area identified to that within a 2km buffer area".* RES object to the imposition of buffers here on the basis that there is likely to be a significant impact. The standard procedure is to assess the landscape element as part of the Landscape and Visual Assessment and not to pre-empt significant effects and as such RES request that the 2km buffers associated with transport routes on sensitive LCAs are removed in favour of an EIA for projects coming forward for planning consent. The existing Dun Law Wind Farm and extension are located within the A68 transport corridor and as such would be largely inhibited under the new SPG.

3. Figure 13 lists various Areas of Constraints and all being constraints, of varying types, that developers routinely consider. For example the RSPB Bird Sensitivity kilometre squares are a snapshot in time with a kilometres resolution and should only be used as an indication prior to more detailed survey work commencing. Due to the age of civilisation in the UK archaeological sites are found almost everywhere and as such, like the majority of constraints in this table, should be left for the developer to identify and avoid, minimise or mitigate any potential impact. As such RES suggests that Figure 13 is removed and all constraints contained within it are removed from the analysis with a view that they can be identified and assessed as part of specific wind farm EIAs.

4. Scenic Viewpoints are identified in Appendix D and are considered within the spatial strategy. The SPG notes that sites to be submitted to planning should consider these viewpoints within the EIA. Therefore as in 3 above these Scenic Viewpoints should be assessed as part of the EIA and not pre-empt this by being presented as a constraint as they currently are.

A particularly significant omission from the SPG is any consideration of project viability. RES agree that it is not for SBC to carry out the type of NPV layer evaluation that RES has done with its SPG, but to take no account of wind speed resource is an obvious issue to address. Although the DECC NOABL mapping gives a good indication of where the better and lesser resource potential exists and could be used here. By ignoring this important dimension, we end up with an SPG that shows good potential (yellow and light blue) in areas that are in low lying glens. To exemplify this, it looks like there is a very good potential immediately to the east of Black Hill Wind Farm on the SPG map however having a simple look at the topography shows that area is not suitable. Indeed, earlier in the report, there is a contradiction in that it is explicitly concluded that there is no extension potential in the immediate vicinity of Black Hill.

In conclusion the Scottish Borders Spatial Plan should be simplified and more encouraging to developers and this should be done by removing the constraints noted above and allowing them to be assessed in the developers" EIA. Broad Areas of Search should be introduced as well as wind resource being introduced.

With the above in mind we would be willing to meet with you to discuss in further detail the above points we have raised.

We are grateful for this opportunity to comment upon this draft SPG.

Yours sincerely,

Alan Macintyre
Development Project Manager
[redacted]

RES UK & Ireland Limited
3rd Floor, STV, Pacific Quay
Glasgow G51 1PQ, United Kingdom
[redacted]

Planning & Research Team
Scottish Borders Council
Council Headquarters
Newton St Boswells
Scottish Borders
TD6 0SA

Our Ref: RRL-003573

9 May 2012

Dear Sirs,

RE: SCOTTISH BORDERS LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT

RES is one of the world's leading independent renewable energy developers with operations across Europe, North America and Asia-Pacific. RES is a British company and has been at the forefront of wind energy development since the 1970s. We have developed and/or built more than 100 wind farms (6.5GW of wind energy capacity worldwide) including approximately 10% of the UK's wind energy. This includes nine wind farms across Scotland with a total generation capacity of nearly 200MW.

RES is a market leader with strong environmental, engineering and commercial credentials and has actively engaged in supporting the development of the renewable energy sector in the UK and abroad. Engaging with stakeholders, statutory authorities and policy makers is an important part of RES's business model both at a project and a national level and as such RES welcome the opportunity to contribute towards the Scottish Borders' Main Issues Report (MIR).

RES acknowledges that one of the main aims of the Local Development Plan is to integrate climate change adaptation requirements such as renewable energy production and the contribution that Scottish Borders Council has made to date in consenting a number of wind energy developments across the authority. However, it is clear that further development will be required in order to move towards the national targets to generate the equivalent of 100 per cent of Scotland's electricity consumption from renewable sources by 2020.

While the MIR does reference Scottish Climate Change Targets it should also acknowledge the above noted Government aim to ensure the country produces the equivalent of 100 per cent of Scotland's own electricity demand from renewable resources by 2020. Although future off-shore wind development has a great deal of potential it won't necessarily count towards the local authority's own contribution to national targets. Furthermore, onshore wind is the most advanced renewable energy technology and as such is the quickest and most cost effective way of meeting these national targets. Consequently the MIR should be more positive about the potential that onshore wind energy development in the Borders has to be an important part of the Scottish Borders' contribution towards these national targets, notably within paragraphs 2.14 – 2.19.

With regard to the specific questions identified within the MIR:

Q1: Vision

The Local Development Plan should acknowledge the potential that Renewable Energy Development has to attract further inward investment to the Scottish Borders and contribute towards ensuring that the LDP's stated vision is achieved. RES supports the overall aims of the Vision presented however the Vision should clearly acknowledge the potential of renewable energy development in achieving these goals.

Q2: Local Development Plan Main Aims

No objections to the Aims listed. However, given the importance of Renewable Energy Development in achieving national targets and contributing to the local economy, the proposed Aims should include the 'promotion of further renewable energy generation'. At present the Aims only include renewable energy generation as in relation to climate change adaptation requirements. Renewable energy generation is not an adaptation measure for climate change, it is a preventative measure. Renewable energy has an important role to play in reducing reliance on fossil fuels and increasing security of supply. Furthermore, Renewable Energy Development already makes a significant contribution to the local economy, notably through the creation of local jobs, procurement of local services and payment of business rates.

Q16: Climate Change

(a) The Council should adopt the alternative option and retain the policy on the protection of prime agricultural land. The extension of this policy to incorporate carbon rich soils is unnecessary in light of the Scottish Government's guidance on calculating the potential impact of wind farm developments on the soil carbon stocks held in peats which provides a transparent and easy to follow method for estimating the impacts of wind farms on the carbon dynamics of peat lands.

Regardless of which option is eventually adopted it should not be used to enforce a blanket ban on appropriate developments on both prime agricultural lands or carbon rich soils and applications should be considered on their own, individual merits.

(b) No comment

(c) While we retain concerns regarding the Council's Supplementary Planning Guidance (SPG) on Wind Energy 2011 the option identified within the MIR to determine planning applications for wind turbines on a case-by-case basis, taking cognisance of the SPG, is more preferable than the alternative option. As detailed above, Scottish Government Policy supports the continued development of a variety of renewable energy resources, including onshore wind. The adoption of the alternative option to *"consider that the Borders landscape is already at saturation point in terms of wind turbines and incorporate a policy that deals with them on a 'by exception' basis"* would be inappropriate and unnecessary, given the actual ability of the Borders landscape to accommodate further development, and contrary to National Planning Policy.

I trust the above will be of interest. If you require any additional information please don't hesitate to contact us directly.

Yours faithfully,

Graeme Kerr
Development Project Manager
[redacted]