Hill, Laura (Planning HQ)

From: McCarthy, Deirdre (Scotland) [redacted]
Sent: 28 February 2014 15:26
To: localplan
Cc: Wallace, Craig (UK); Paul Carvey
Subject: Scottish Borders Council Local Development Plan Representation
Attachments: SBC Proposed LDP Rep Final 2.pdf

Importance: High

Dear Sir/Madam,

Representation to Scottish Borders Council Proposed Local Development Plan consultation on behalf of Infinis

Jones Lang LaSalle represents the Infinis group and is pleased to enclose the attached representation to the Scottish Borders Council (SBC) Proposed Local Development Plan (PLDP) consultation.

I would be extremely grateful if you could provide confirmation of receipt of this representation and registration of the response on behalf of our client.

Should you require anything further please do not hesitate to contact me.

Kind regards
Deirdre

Deirdre McCarthy
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28 February 2014

Dear Sirs

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Introduction

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In terms of the structure of this representation, specific observations on the PLDP relevant to Infinis's business interests are provided. Infinis has significant concerns regarding certain aspects of the PLDP primarily in relation to renewable energy.

On the whole, Infinis finds the PLDP to be lacking in its commitment to progress a spatial framework for renewable energy development that is consistent with SPP and Scottish Government renewable energy policy and advice. This is a significant concern to Infinis and does not give confidence that the LDP, once adopted, will provide a suitable basis to assess renewable energy proposals against in future. Although an updated Landscape Capacity and Cumulative Impact study has been undertaken, there is a reliance on the existing SPG, which for reasons set out below is considered to be inconsistent with Scottish Government policy and advice.

Background

This representation to the PLDP is intended as a positive contribution to the preparation of the Local Development Plan (LDP). Infinis has a number of development interests within the SBC

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Background

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area and the purpose of this representation is to highlight areas of the PLDP that are of concern, primarily with regard to the inconsistency of the PLDP with Scottish Planning Policy (SPP) and wider Scottish Government Renewable Energy policies. It is considered that the LDP as a whole should plan more positively for renewable energy development than the PLDP indicates, which is of significant importance considering the European, UK and Scottish Government renewable energy policy support for increasing the deployment of renewables within the UK, and meeting the targets set out at national level.

Meeting the Challenges for the Scottish Borders

Under this section SBC outline a number of challenges and corresponding 'Key Outcomes' which will be incorporated into the LDP to assist in meeting these challenges. Infinis is pleased to note that climate change is listed as one of the five topics within which key outcomes have been identified. Furthermore it is encouraging that SBC has acknowledged the Scottish Government targets to reduce greenhouse gas emissions by 42% by 2020 and 80% by 2050, from 2009 levels.

In order to meet these targets SBC must acknowledge the importance of encouraging the development of renewable energy, and specifically encouraging mature and viable technologies such a wind energy generation. The supporting text at section 2.18 of the PLDP refers specifically to wind energy and suggests a 'precautionary approach' is undertaken to wind energy development. The wording is overtly negative and unsupportive of wind energy development within the SBC area, which is contrary to national policy.

'Key Outcome 10' of the PLDP promotes *"The encouragement of renewable energy only in sustainable locations where adverse potential cumulative impact can be avoided"*. This Key Outcome in itself is contrary to the advice set out in SPP which states *"Planning authorities should support the development of wind farms in locations where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed."(paragraph 187)*

Infinis request that SBC amend this Key Outcome to ensure it is actively in alignment with SPP.

Vision, Aims and Spatial Strategy

Section 2 of the PLDP sets out the 'Vision' for the SBC area which sets the framework for the main issues facing the development of the area over the next 20 years. Infinis acknowledges the importance of setting out a 'Vision' for the area in providing a context for the aims, objectives and spatial strategy. Infinis does not however agree with the 'Vision' as set out on page 15 of the PLDP and view this to lack sufficient reference to the challenge of addressing climate change. This section should include reference to the importance of tackling climate change in line with national policy and indeed as is set out in the main aims of the PLDP.

Under the heading 'Main Aims' the PLDP acknowledges that heat and power generation from renewable sources will help to address the effects of climate change and encourage the adaptation to a low carbon economy, and Infinis is supportive of this statement.

Infinis is of the view that in order to meet Scottish Government targets for reducing greenhouse gas emissions and to ensure consistency with national policy, more needs to be done at the local level to encourage and provide support for renewable energy and the LDP should be prepared with a more positive policy emphasis on planning for renewable energy development.

Proposed Local Development Plan Policies

Economic Development Policies
Policy ED9 Renewable Energy Development

It is encouraging that the PLDP recognises the Scottish Government target of 100% electricity demand equivalent from renewables by 2020 and the 30% target for overall energy demand from renewables by 2020. In the shorter term in respect of support for renewables, SBC should also highlight the target by the Scottish Government to generate the equivalent of 50% of Scotland's electricity needs from renewable energy by 2015.

The National Planning Framework 2 (NPF2) highlights the Scottish Government's commitment to establishing Scotland as a leading location for the development of renewable energy technology, and as an energy exporter over the long term and as part of this is encouraging a mix of renewable energy technologies. The draft NPF3, currently before the Scottish Parliament for scrutiny, reiterates the importance of an energy mix in delivering a low carbon economy. The PLDP states at page 55 that *"The policy is generally supportive of a wide range of renewable energy mechanisms…"*, and mentions a number of technologies, however no mention is made of onshore wind, one of the most advanced and mature of the available technologies currently being promoted in Scotland.

The supporting text of the policy refers to two 'Background Papers': a public attitudes survey; and an independent survey on the economic benefits of wind turbines. There is not, however, any evidence or information to show how the results of these surveys have contributed to informing the policy, despite the PLDP stating that the Policy *"seeks to create a balance between all these conflicting issues, taking cognisance of a range of guidance including SPP and Scottish Government on line advice"*. From a review of the two Background Papers, it is our view that the final proposed policy ED9 is overly negative and does not accurately reflect or represent the positive facts and conclusions from these reports in terms of the economic opportunities onshore wind energy can provide to the SBC area and the positive attitudes that many people have in respect of wind energy.

In particular, the Public Survey on Attitudes towards Wind Energy concludes that there are *"a greater number (of respondents) who either support the development of wind turbines or are*

fairly ambivalent to their development and more would agree than disagree that Scottish Borders Council should take an active role in encouraging wind turbines."

In terms of the Biggar Economics report entitled 'Economic Impact of Wind Energy in the Scottish Borders', the report summarises the results and states that *"In 2012 onshore wind energy contributed at least £10.8 million gross value added (GVA), to the Scottish Borders economy (0.7% of the total GVA in the Scottish Borders economy[1]) and supported 115 local jobs. By 2020 this impact could be up to £33.3 million GVA and 325 jobs."*

The report also highlights that this impact does not include the multiplier effects associated with employees spending wages in the local economy, and other economic effects such as non-domestic rates paid, so the full impact could be considerably higher. The report also notes several actions that can be taken by SBC to realise this opportunity. The key findings, conclusions and actions from this report do not appear to have been given appropriate weight in the formulation of the policy.

The PLDP refers to three documents which should be referred to in the processing of planning applications, one of which includes the Supplementary Planning Guidance (SPG) on Wind Energy (May 2011). It is JLL's considered opinion that the current SPG for onshore wind energy development does not meet Scottish Government guidance regarding the preparation of such spatial frameworks. The PLDP states that the "spatial strategy" has been updated in line with comments from the Scottish Government as part of the consultation on the Main Issues Report, however, no updated SPG, 'spatial strategy' or Supplementary Guidance (SG) is provided as part of the PLDP.

For the following reasons the SPG is considered to be contrary to national policy:

- No robust landscape capacity assessment has been undertaken to inform the SPG, and it relies on an outdated landscape capacity assessment and additional work undertaken by the McCauley Institute, which in itself did not specifically consider landscape capacity. It is acknowledged that the Ironside Farrar study (Landscape Capacity and Cumulative Impact Study) has been undertaken and may inform a future update of the SPG/SG once the PLDP process has been complete and the LDP is adopted, however this would need to reflect the impending changes to the Scottish Government policy on the preparation of spatial frameworks, which is to be communicated in the revised SPP due to be published later in 2014. A separate assessment of the Ironside Farrar study has been undertaken as part of this PLDP representation and is provided at Appendix 2.

- The SPG identifies the protection of primary receptors, highly visible sensitive sites, and tourist/recreation routes as a Stage 1 constraint. SPP is quite clear that Stage 1

[1] GVA data from National Statistics for NUTS3 areas, gives a GVA figure for the Scottish Borders for 2011 (the latest year for which data is available) of £1,513 million (1.4% of total GVA for the Scottish economy).

constraints should only consist of national and international designations, greenbelt and the areas where cumulative capacity limits further development.

- The SPG also applies a 2km buffer zone to roads, individual houses, path routes, viewpoints and other receptors, which is contrary to the advice within SPP.

The PLDP states that the determination of planning applications for wind energy development will continue to be determined taking into account the existing SPG, and that the spatial strategy has been updated in line with comments from the Scottish Government. This statement is unclear, as the spatial strategy provided in 'ED9a' is that produced as part of the 2011 SPG. Furthermore no consultation has been undertaken in the production of the Ironside Farrar report which was used to inform ED9b, and which is proposed to be used for assessing wind turbine proposals.

Sections 6.9.9 and 6.9.10 refer again to the Ironside Farrar report and state that Table 6.1 of the study will be used to consider planning applications for wind turbines. This report has not been the subject of formal consultation by SBC, and as such has not been formally adopted. A separate assessment of the Ironside Farrar study has been undertaken as part of this PLDP representation and is provided at Appendix 2.

The PLDP does not set out when it is likely to produce an update to the SPG in the form of Supplementary Guidance (SG). The Scottish Government's policies on the preparation of LDPs requires them to be concise documents, with SG produced alongside providing the policy detail on certain topic matters. In addition, and as referred to above, the imminent publication of the revised SPP will provide updated guidance on the approach to Spatial Frameworks, and it would appear sensible that any SG is prepared in accordance with this to ensure it can reflect Government policy during the currency of the LDP.

Referring specifically to the Policy text of ED9, Infinis view the policy to be overly stringent and onerous on potential developers. The Policy, at over two pages in length, is excessively detailed and covers many aspects which are already considered within SBC's Environmental Promotion and Protection policies.

In reference to all forms of renewable energy the policy states that "*Renewable energy developments will be approved provided that, there are no unacceptable adverse impacts which cannot be fully mitigated on the natural heritage including the water environment, landscape, biodiversity, built environment and archaeological heritage;*". The term 'fully' is considered to be unacceptably stringent and inconsistent with SPP. It is recommended that the word 'fully' is replaced with the word 'satisfactorily' which is in line with the terminology used in SPP.

The main thrust of the remainder of the policy is specific to wind turbine proposals. The key points and observations to note under the headings landscape, visual impact and cumulative landscape and visual impacts include:

Landscape
Bullet point three states that *"Proposals should not have adverse impacts on areas exhibiting remote qualities which are valued as 'wild land'."* Landscape impacts are likely to occur in respect of large scale commercial wind farms, however the test should be whether these effects are acceptable or not and as such the policy should read *"…unacceptable adverse impacts…"*.

Visual Impact
The policy refers to 'minimal effects' on sensitive receptors. Infinis considers that appropriate wording in this respect should state that *'through the siting and design of a wind farm, developers should seek to minimise and where possible avoid significant effects on sensitive receptors'*, which would be tested through a visual impact assessment and in the case of residential properties a residential amenity assessment.

Cumulative Landscape and Visual
Infinis are of the view that the text of the policy relating to cumulative impacts is unreasonable, unduly restrictive and wholly unsupportive.

Bullet point one states that cumulative impacts *"must be avoided where an existing wind farm development is present in an adjoining area and can be viewed together with the proposed development"*. This statement is considered to be wholly unsupportive and gives the view that such developments will be considered unfavourable without consideration of an application and accompanying supporting information, as well as any benefits which may be associated with a scheme. The policy suggests extensions to existing schemes will not be considered favourably by SBC and the policy as proposed would effectively prohibit potential extensions. Infinis would remind SBC that each application is required to be considered on its own individual merits.

Bullet point two also states that *inter alia '..impacts must be avoided..'*. Again we would highlight that this is inconsistent with SPP, in particular paragraph 187 which states *"Planning authorities should support the development of wind farms in locations where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed."* We would encourage SBC to adapt this policy accordingly.

Bullet point three refers to the existing spatial strategy, and states that where potential cumulative impacts are likely to occur there will be a presumption against development unless it can be demonstrated to the satisfaction of SBC that there would be no significant additional detrimental impacts. It is our considered opinion that this 'presumption against development' is simply incorrect and not in compliance with SPP. This sentence should be reworded to read, *"Within the areas identified in the spatial strategy where existing development means that potential cumulative impacts are likely to occur, a detailed cumulative impact assessment will be required to be undertaken to demonstrate that there would be no additional unacceptable significant detrimental impacts."* Furthermore we would point out that the current SPG 'spatial

strategy' map and figure ED9b are at odds with one another and lack consistency in terms of where they direct development.

Each application should be determined on its own individual merits and on the basis of detailed technical assessments which should be submitted to accompany any application.

Key Policies To Which ED9 Should Be Cross Referenced

In terms of the 'Key Policies' which the PLDP advises should be cross referred to Policy ED9, Infinis disagrees with the inclusion of Policy PMD2 Quality Standards, and Policy HD3 Protection of Residential Amenity.

PMD2 is more relevant to traditional forms of commercial development and is not considered to be relevant to wind energy development. Policy PMD1 Sustainability is considered to be more in keeping with potential renewable energy developments.

HD3 relates to Housing Development and residential amenity, and it is considered that this policy is specific to housing development and is not intended to be relevant to the consideration of commercial scale wind energy. Policy ED9 itself includes requirements in respect of protection of residential amenity.

Policy ED10 Protection of Agricultural Land and Carbon Rich Soils

This policy is considered to be overly onerous on developers in terms of the requirement by SBC for developers to demonstrate that no other sites are available should a site be located in an area of significant carbon rich soil. Applicants are required to demonstrate through the EIA process technical solutions to protect carbon rich soils, and ensure that significant effects on peat would not occur.

<u>Environmental Promotion and Protection Policies</u>
Policy EP7 Listed Building

The part of the policy which states that "*New development that adversely affects the setting of a Listed Building will not be permitted.",* is considered to be overly negative and onerous. Setting is an extremely difficult issue to define, and it is considered that the impacts need to be weighed against potential benefits of a social or economic nature.

Conclusions

Infinis intends that this representation be considered as a positive and proactive contribution to progression of the LDP. It is our considered view that appropriate reflection of the matters referred to above would be beneficial to the progression of the LDP as a whole, should it be

amended, and more importantly to support and provide suitable encouragement for the delivery of appropriate wind energy development within the SBC administrative area.

Should SBC require any additional detail on any of the planning matters identified above, then we would be pleased to discuss further, and in this case please contact me at your earliest convenience.

I would be grateful for your acknowledgement of this letter by return.

Yours sincerely
For Jones Lang LaSalle

Craig Wallace
Director
Planning and Development

cc Mr Paul Carvey (Infinis)
Mr Keith Hobbs (Infinis)

Appendix 1 Infinis

In the year to 31 March 2013 Infinis generated approximately 7% of the UK's renewable power and was the third largest renewable generator in the UK. Infinis operates a growing portfolio of onshore wind, landfill gas and hydro plants across the UK.

In Scotland, Infinis currently has approximately 148MW of installed generating capacity at seven operational wind farms. At present, Infinis has a number of development interests in the renewable energy sector within the Scottish Borders Council region. These relate to a number of onshore wind energy developments and, if granted consent, would represent a further 74MW of installed capacity in the region. These developments are the subject of live planning applications to SBC as follows:

- Cummings Hill Wind Farm, north east of Chesters and south of Jedburgh, Scottish Borders
- Glenkerie Extension Wind Farm, Broughton, Biggar, Scottish Borders
- Windy Edge Wind Farm, Land North East And North West Of Farmhouse Braidlie (Windy Edge), Hawick, Scottish Borders

Appendix 2: Review of Scottish Borders, LDP 2013, Supporting Documents: Wind Energy Consultancy; Landscape Capacity And Cumulative Impact, Final Report July 2013

INFINIS

REVIEW OF SCOTTISH BORDERS, LDP 2013, SUPPORTING DOCUMENTS: WIND ENERGY CONSULTANCY; LANDSCAPE CAPACITY AND CUMULATIVE IMPACT, FINAL REPORT JULY 2013

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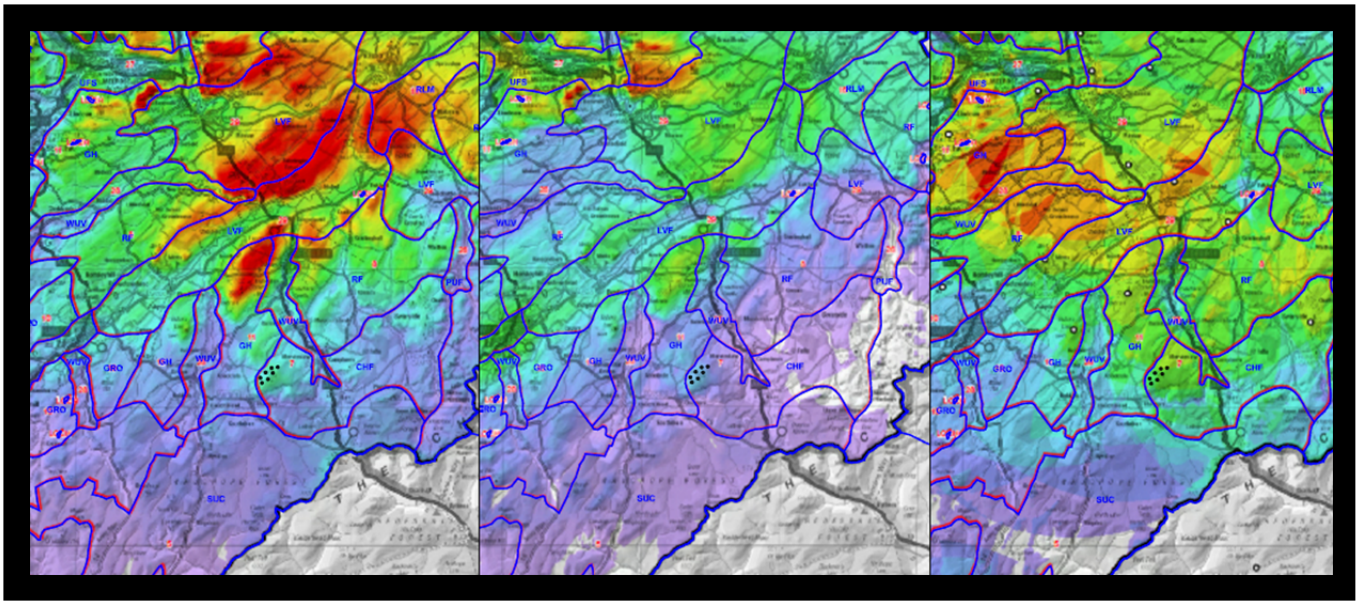

SINCLAIR KNIGHT MERZ
SKM

Cummings Hill

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Document history and status

Revision	Date	Description	By	Review	Approved

Contents

1. Introduction

This report provides a review and critique of one of the supporting documents to the Scottish Borders Council Local Development Plan 2013, i.e. the Wind Energy Consultancy; Landscape Capacity and Cumulative Impact (WECLCCI). The review focusses on the technical landscape issues that have been set out in the document to derive the capacity statements which form part of the proposed LDP, 2013.

Prior to this document, policy on the siting of wind farm development was given in the Scottish Borders Supplementary Planning Guidance (SPG) – Wind Energy, 2011. The new WECLCCI follows on from the approval of the Local Landscape Designations SPG and the amendment to the AGLV/SLA boundaries.

This advice note focuses on the following points:

1) Confirming the scope and reliability of the study;

2) A review of the findings of the study;

3) A critique of the analysis and judgements made in the document; and

4) Advice on the implications for current applications in the Scottish Borders.

Whilst the review focusses on the WECLCCI we acknowledge that the findings of the document are directly linked to the proposed LDP and much of the advice given is bound into Policy ED9: Renewable Energy Development.

2. Review of Methodology

2.1 Overview

The stated aims of the WECLCCI study are to consider "*the capacity of the Scottish Borders landscape to accommodate onshore wind energy development. The landscape capacity assessment is based on an assessment of landscape sensitivity and value of the different landscape character types and areas in Scottish Borders.*"

The study has used a standard methodology based on considering the following main elements:

"1) The sensitivity of the landscape fabric and character to wind energy development, which includes landscape features, elements and characteristics and its visual sensitivity which includes intervisibility and receptors types.

2) The value of the landscape as determined by stakeholders. This may include national or local recognition by landscape designation or cultural association, or value to a community of interest such as a local residents or an interest group."

To determine the baseline sensitivity the following three factors are drawn together:

- *The **landscape character** assessment… landscape character types (LCTs) and landscape character areas (LCAs) in Scottish Borders identified and described in the Borders Landscape Assessment (ASH Consulting Group for SNH, 1998).*
- ***Landscape value**… determined partly through landscape designations.*
- *The **visual baseline** assessment…* based on *computer-based intervisibility assessment based on different turbine heights and receptor types.*

The study in "***Appendix 2** describes a breakdown of the physical and perceptual characteristics that contribute to landscape character, visual sensitivity and value. Each criterion is described and evaluated in terms of its sensitivity to wind energy development. An overall assessment of **high, medium** or **low** is derived from a composite of all the criteria."*

*"an overall professional judgement on capacity for developments of different types is made on the basis of sensitivity and value. Landscape capacity is rated according to the degree to which wind turbines may be accommodated without adverse effects on sensitivity and value. The descriptive criteria below for **high, medium** and **low** describe the main thresholds on a continuum between no capacity and high capacity."*

The following definitions apply to the thresholds of low, medium and high landscape value:

Low Capacity: A landscape that is both sensitive to wind turbine development and has a high value, where only a slight level of change can be accommodated without significantly affecting any of the key defining criteria.

Medium Capacity: A landscape that has some sensitivity to wind turbine development and has some aspects of value; where a moderate level of change can be accommodated which may significantly affect some of the defining criteria.

High Capacity: A landscape that has low sensitivity to wind turbine development and has low value, and can accommodate change that significantly affects most of the key defining criteria.

2.2 Turbine Height

The methodology of the WECLCCI seems to be logical and relatively standard, and if applied consistently and accurately should be reasonably robust. One area where the study can be criticised is with regard to the rather coarse grain used for defining capacity according to turbine height. The following table used in the study includes relatively broad size bands:

Table 5.1. Turbine Size Categories

Size Category	Blade Tip Height	Typical Use
Small	Turbines less than 25m in height	Typically used for domestic and farm FiT schemes
Medium	Turbines 25m to <50m in height	Typically used for farm and industrial FiT schemes
Large	Turbines 50m to <100m in height	Single turbine FiT schemes and smaller turbines used in commercial schemes
Very Large	Turbines over 100m high.	Most commercial windfarms

Too much weight is given overall to these arbitrary height intervals. There should be an acknowledgement as per the advice given in Designing Windfarms in the Landscape, SNH 2009, that: *"although the visibility extent of turbines will obviously increase with their greater height, the relationship between visual impact and turbine size is not directly proportional. Principally, this is because a windfarm is viewed within a surrounding context, which varies; and also because the actual size of a wind turbine is usually difficult to perceive."*

Ideally there should be some further subdivision around the 100-125m threshold which reflects the height of many schemes within the Scottish Borders, with a separate higher banding for larger proposals. The bandings given above are used in the methodology to gauge the relative visibility of sites and therefore the judgements on visual sensitivity of locations are artificially skewed.

Developers should be given a freer hand to design and plan wind farms according the characteristics of the receiving landscape. *"Choice of turbine size is an integral part of the design process of a windfarm in relation to key landscape and visual characteristics. Identification of the key landscape characteristics, their sensitivity and capacity to accommodate change will inform this."*

Designing Windfarms in the Landscape underlines this point by stating that: *"As the experience of different landscapes varies greatly, it is not appropriate to provide strict guidelines on turbine sizes that should be used for particular landscapes. Site-specific assessment and design is **essential** for each development proposal."*

2.3 Landscape Character

The WECLCCI sets out a general commentary on landscape suitability within the Scottish Borders as follows:

"Extensive upland areas such as the Moorfoot Hills and parts of the Southern Uplands tend to have the highest inherent capacity for the largest size turbines and turbine developments. This reflects the suitable characteristics of scale, simplicity of landform and lack of small scale developments. … Upland fringe areas are suitable for more modest levels of development including medium and large turbines. Lowland areas are most suitable for medium size turbines, singly or in smaller groupings. Extensive areas, including river valleys, prominent uplands, highly visible escarpments and the coast, have no capacity for wind energy development." (WECLCCI Executive Summary)

So we can draw from this that according to the SPD the only suitable attributes for landscape capacity for wind farm development relate to upland/upland fringe areas with *"suitable characteristics of scale, simplicity of landform and lack of small scale developments."* This starting point is in our view overly restrictive and does not acknowledge that many landscapes exhibiting very similar characteristics are not necessarily in upland areas. Furthermore, accepting development within a landscape character unit does not necessarily immediately affect landscape character. SNH's Designing Windfarms in the Landscape acknowledges that there are three steps in determining acceptable levels of change as confirmed in Section 2.6.2 of the SPD of these greater acknowledgement needs to be given to Landscape Accommodation: *"where the aim is to retain the overall character of the landscape, yet accepting that development may be allowed which will have an impact on the landscape locally; development fits within the landscape and does not change its character on a large scale. Landscape accommodation implies that there may be important landscape-related constraints in terms of the siting and scale of windfarms, but that suitably designed windfarms can be compatible with this objective." P42*

Overall the document is conservative and assigns very limited areas of further capacity in the Scottish Borders. We have compared the capacity statements and analysis for the four upland LCTs which according to the SPD have the greatest capacity to accept wind farm development with one of the Cheviot Foothills LCT which has many similar characteristics but which has been assigned a 'no capacity' rating. Despite their suitability the upland LCTs are given relatively limited capacity ratings and therefore it is useful to compare this with the judgements for the Cheviot Foothills LCT. This comparison is set out in the following tables, and compares the following:

Table 4, Comparison of Overall Capacity Ratings for +100m Very Large Turbines - Overall capacity rating for each Landscape Type sub – unit and the associated commentary taken from Part 1 of the SPD; and

Table 5, Comparison of Assessments of Landscape Sensitivity of LCTs from Appendix 5 - The assessment of Landscape Character suitability taken from Appendix 5: Assessment of Landscape Capacity for Landscape Character Types.

Table 4: Comparison of Overall Capacity Ratings for +100m Very Large Turbines

Landscape Type	Southern Uplands with Scattered Forest- 4 (ii) Dun Knowe Group	Southern Uplands with Scattered Forest- 4 (iii) Cauldcleuch Head Group	Southern Uplands Forest Covered- 5 (i) Craik	Southern Uplands Forest Covered- 5 (ii) Wauchope/ Newcastleton	Cheviot Foothills- 7 Falla Group
Capacity assignment on Figure 6.1c (p105)	Medium Capacity	Medium to No Capacity	Medium to No Capacity	Low to No Capacity	No Capacity
Table 6.1(iii). Turbine Guidance	Group size: small to medium	Group size: small to medium	Group size: small to medium	Group Size: Individual (Medium), small/ medium-Medium (Large and Very Large Turbines)	Group Size: Individual (Medium)
Table 6.1(iii). Comments Column – Existing Development	One wind farm at Langhope Rig (10T) and one application at Barrel Law (8T)	No windfarms/ turbines or applications for windfarms or turbines	No windfarms/ turbines or applications for windfarms or turbines	No windfarms/ turbines or applications for windfarms or turbines	No windfarms/ turbines or applications for windfarms or turbines
Table 6.1(iii). Comments Column – Landscape Designations	No landscape designations, long distance footpaths and little human settlement within and nearby, although issues regarding forestry removal	No landscape designations, long distance footpaths. The area is sparsely populated and has a low intervisibility	No landscape designations, low intervisibility and is sparsely populated. The western most area contains a portion of the Southern Upland Way, which impacts on the capacity of the landscape to no capacity for large and very large turbines in	Relatively close location to the Northumberland National Park. The Carter Bar/ A68 England Border viewpoint has a much higher local sensitivity with no capacity in the area immediately in the vicinity of this iconic viewpoint or in the short to mid-range view looking north	Has large or higher intervisibility. The southern and eastern areas are designated as a SLA and from the important and popular Carter Bar viewpoint there is an open panoramic view across this landscape

Landscape Type	Southern Uplands with Scattered Forest- 4 (ii) Dun Knowe Group	Southern Uplands with Scattered Forest- 4 (iii) Cauldcleuch Head Group	Southern Uplands Forest Covered- 5 (i) Craik	Southern Uplands Forest Covered- 5 (ii) Wauchope/ Newcastleton	Cheviot Foothills- 7 Falla Group
			the western area		
Table 6.1(iii). Comments Column – Capacity Statement	Surrounding topography provides a degree of topographical containment for large and very large turbines, intervisibility within this area is generally fairly low	There is capacity for large/very large turbines in the more elevated upland areas where topographical containment reduces intervisibility	Large/very large turbines can be accommodated in the larger scale elevated upland areas and take advantage of the topographical containment created by the landscape	Can accommodate turbine developments due to the upland topography creating topographical containment, the sparsely populated landscape with the occasional farmstead being present and the lower degree of intervisibility from settlements, transport routes and viewpoints	Only low capacity for medium turbines in the northern areas of this LCA either side of the A68, these as individual medium sized turbines should be sited in areas with lower intervisibility and alongside individual farmsteads and dwellings where these turbines can be visually read as domestic energy generation

Table 6: Comparison of Assessments of Landscape Sensitivity of LCTs from Appendix 5

Landscape Type	Southern Uplands with Scattered Forest- 4 (includes 4 (ii) and 4 (iii))	Southern Uplands Forest Covered- 5 (includes 5 (ii) and 5 (iii))	Cheviot Foothills- 7
Scale	Large	Large	Medium
Landform	Upland undulating dome shaped hills separated by incised river valleys	Simple- gently undulating rounded hills with enclosed valleys	Simple- Undulating upland landform
Pattern	Simple pattern of open rough grazing, heather moorland and plantation woodlands	Large commercial forestry plantations	Grazing fields and rough grassland; commercial forestry
Development	Sparse	Sparse	Sparse
Quality	Open, rural, exposed windswept area with a wilderness character	Rural upland character	Open rural upland character, broadly enclosed by surrounding higher hills
Elements and Features	Few features, with occasional road or reservoir/ loch	Few viewpoints from rural roads. Few cycle routes and core paths	Dere Street long distance footpath and historic sites including forts, settlements, Cairns and roman camp sites
Context	Possible views from occasional farmsteads/ dwellings	Strong woodland edges and boundaries	Possible views from Jedburgh, Carter Bar/ A68 English Border viewpoint
Designations	Broadlaw Group LCA is fully within an SLA and the northern part is part of a larger NSA	None	SLA covers eastern area
Community Value	The Southern Upland Way is within the Broadlaw Group. Also local footpaths, fishing Lochs, picnic areas and car parking areas facilitating community use	Limited recreational value, few core paths, Southern Upland Way enters a small area in the western section	Cycle routes and core paths
Cultural value	Historic settlement and fort sites on the lower slopes	Few historical cairns, settlements and stone circles present	Historic sites
Perceptual	Upland landscape with a matrix of woodland and moorland creating a wilderness character	Forested nature could be perceived as a wilderness	Upland farmland character
OVERALL RATING	**Medium**	**Medium**	**Medium/High**

The SPD acknowledges a series of points where there may be variation from the overall capacity assessment for an LCT, in section 6.2.4 the document states that this is usually because of *"one or two key landscape factors which override the characteristics including:*

- *All or part of the character area is much more prominent and visible than the bulk of the area covered by the landscape type;*
- *A particularly small area is covered by the character area compared with the main areas of the landscape type;*
- *Some or all of the character area lies in an area designated to protect a landscape or setting of a town (e.g. National Scenic Areas);*
- *Close proximity to other more sensitive neighbouring character areas which would be significantly affected by wind energy proposals otherwise suitable for the character area.*
- *Close proximity to other landscape types, settlements or industry which reduces the sensitivity of a landscape character or part of an area compared with the bulk of the area covered by the landscape type."*

"A combination of any of these factors might limit the ability of a specific landscape character area or part of an area to accommodate a level of development otherwise acceptable to the type." Importantly the document goes on to state that: "***any specific development should be considered in more detail and assessed against local factors where appropriate."***

This statement and approach is more consistent with the advice given in Designing Windfarms in the Landscape, SNH 2009, whereby *"In addition to the broad-scale information offered by LCAs, LIA* [the Landscape Impact Assessment] *should include an assessment of local landscape characteristics, and how they are experienced, in relation to the specific proposal."*

Therefore whilst the approach to using Landscape Character as the basis for making initial judgements on the suitability of a landscape to accommodate change is correct, the description of landscape character within a landscape unit is a distillation of typical characteristics and therefore, it is inevitably broad brush. There will be site specific conditions within a landscape unit which will vary from the generic description of landscape character and this is the detail that is lost through over reliance on the general landscape character assessments. The capacity study should enable developers to provide the burden of proof for site specific proposals as opposed to basing definitive judgements on landscape suitability. This potential for variation should also be acknowledged within section 6.2.4 of the SPD.

2.4 Visual Sensitivity

The WECLCCI methodology uses an agglomeration of settlements, routes and viewpoints as potential visual receptors across the Scottish Borders and assesses general intervisibility to the landscape. No value is applied to the receptors in terms of their relative sensitivity and although not explicitly stated it is assumed that the computer analysis has been conducted on the basis of a bare land model which does not take account of screening from built form and vegetation cover and is unlikely to use a fine grain of topographic detail. As such this analysis can only at best give a general overview of relative visibility across the Scottish Borders however, the analysis has been used to inform the judgements on capacity. Again understanding and illustrating the visibility of a particular proposal requires careful analysis supported by comprehensive site work and careful interpretation of the receptor sensitivity. The judgements on capacity made on this broad brush analysis should not be used as a strong influence on determining capacity.

The WECLCCI does not seem to have provision for or encourage prominent well designed wind farms, defining greater capacity in those areas where visibility will be restricted and contained by land form. Again this is contrary to the advice given in SNH's Designing Windfarms in the Landscape

which acknowledges that some landscape types are suitable for the approach of Landscape Accommodation whereby a well-designed but prominently sited wind farm can form an acceptable addition to a particular landscape.

We have again compared the capacity statements and analysis for the four upland LCTs which according to the SPD have the greatest capacity to accept wind farm development, this time in respect to their visual sensitivity, with the Cheviot Foothills LCT which has many similar characteristics but which has been assigned a ‘no capacity’ rating. This comparison is set out in the following table, and compares the assessment of Visual Sensitivity suitability taken from Appendix 5: Assessment of Landscape Capacity for Landscape Character Types of the WECLCCI.

Table 5: Comparison of Assessments of Visual Sensitivity of LCT's from Appendix 5

Landscape Sub - Types	Southern Uplands with Scattered Forest- 4 (ii) Dun Knowe Group	Southern Uplands with Scattered Forest- 4 (iii) Cauldcleuch Head Group	Southern Uplands Forest Covered- 5 (i) Craik	Southern Uplands Forest Covered- 5 (ii) Wauchope/ Newcastleton	Cheviot Foothills- 7 Falla Group
Visibility from Transport Routes (150m high object)	Generally Low to Lowest visibility with moderate visibility across the Ettrick Forest in the north	Low to Lowest visibility	Lowest visibility	Low to Lowest visibility	Generally Low to Lowest visibility with moderate visibility across minor roads in the north
Visibility from Viewpoints (150m high object)	None within southern, low to lowest in central and moderate in northern parts	Low to Lowest with none in western parts	None with the exception of scattered southern and western parts	Low to Lowest with none in central parts	Moderate visibility
Receptors	Few farmsteads and dwellings and occasional road	Few farmsteads and dwellings and occasional road	Few residential dwellings and occasional roads with increase in receptors around Carter Bar A68	Few residential dwellings and occasional roads with increase in receptors around Carter Bar A68	Sparsely distributed individual farmsteads and dwellings with the occasional larger grouping of dwellings, Dere Street historical route, Carter Bar/ A68 English Border viewpoint and minor and more important A roads.
Internal Visibility	Long distance views from high points but views generally limited by landform	Long distance views from high points but views generally limited by landform	Hills and woodland within the area limits internal visibility	Hills and woodland within the area limits internal visibility	Broad undulating landscape creates pockets of containment
External Visibility	Possible limited visibility due to topographical containment	Possible limited visibility due to topographical containment	Upland landscape and topography creates containment	Upland landscape and topography creates containment	There will be views to and from the high points to the east and south that will overlook the character area
OVERALL RATING	**Medium/Low**	**Medium/Low**	**Low**	**Low**	**High**

2.5 Cumulative Development

As with the analysis of landscape suitability and visual sensitivity the WECLCCI takes a conservative line with regards to cumulative wind farm development. Whilst it is acknowledged that precautionary approach may be needed it would be preferable if the document focussed on setting guidelines for acceptable cumulative development to allow a burden of proof to be placed upon the developer to identify where wind farm development in the context of existing wind farm development is appropriate.

2.6 Comparative Analysis

The capacity statements are derived from the detailed analysis of the tripartite criteria set out in Appendix 5: Assessment of Landscape Capacity for Landscape Character Types. The assessment provides three tables setting out statements on criteria /thresholds against attributes for the following headings: Landscape Character Sensitivity; Visual Sensitivity; and Landscape Value.

To assist in understanding whether the reporting is valid and in accordance with the methodology, we have set out the capacity assessment text from Appendix 5, taking the Cheviot Foothills LCT assessment on page pA25 as an example, in the first column of the following tables and compared this with the generic considerations that have been applied to determine sensitivity against each of the criteria, in the second column of the tables. These statements are taken from Appendix 2, Cumulative Impact and Landscape Capacity Assessment Methodologies in Tables 3-5 of WECLCCI Part 2. Lastly we have reviewed these in detail and have set out our analysis and commentary on the assessment within the final column in the tables.

To assist in understanding the visual sensitivity assessment, Figure 1 provides a side by side comparison of the Visual Sensitivity ratings given to the Cummings Hill site, as an example, in relation to the 150m development typology.

This exercise clearly illustrates our view that the WECLCCI overstates landscape and visual sensitivity and therefore imposes an overly restrictive capacity rating to each of the LCTs.

Table 6: Analysis of Landscape Character Sensitivity – Cheviot Foothills LCT

SPD Assessment		SPD – Factors Affecting Sensitivity (Table 3 Appendix 2)	SKM Analysis
Landscape Character **Sensitivity**	**Criteria /Thresholds**		
Scale	Medium scale landscape. **Medium**	Consideration of horizontal and vertical scale. Larger scale landscapes are generally considered more able to accommodate commercial wind turbines, although a smaller size of turbine may reduce impacts. A larger physical area would be able to accommodate more development depending on other aspects determining capacity.	Some medium scale forestry blocks, but adjacent to large scale forestry plantations. Large scale field pattern, with apparent scale increased by limited enclosing walls/fences. **Medium/Low**
Landform	Undulating upland landform with broad sloping areas and broad flat platform areas enclosed by hills and plateau edges. **High/ Medium**	The relationship between wind turbines and landform is complex and also dependent on scale. Generally simple landforms: flat, undulating or gently rolling, are considered less sensitive and complex landforms more sensitive, especially if smaller scale. Landforms of sufficient scale may provide opportunities for screening or backgrounding turbines, reducing their visual sensitivity.	Simple rolling land form without dramatic topographical features, smooth contours, locally well contained and separate from adjacent valley systems. **Medium/Low**
Pattern	Simple enclosed grazing fields with more open rough grassland areas there are areas of commercial plantation forestry creating	The pattern of land cover (woodland, field boundaries, crops, roads, settlements etc.). Degree of strength, regularity, fragmentation. Minimal or simple landscape patterns are considered less sensitive to wind turbine	Simple palette of large scale forestry blocks and plantations and upland grazing land. **Low**

SPD Assessment		SPD – Factors Affecting Sensitivity (Table 3 Appendix 2)	SKM Analysis
	blocks of dense woodland. **Medium**	development. Again the relationship to scale is important.	
Development	There are a greater number of individual farmsteads and small settlements/ groups of individual dwellings and a greater number of minor roads. However this is still a relatively sparsely populated landscape. **Medium**	The degree of built or infrastructure development will affect suitability. In general a greater level of development is more suitable, particularly large scale industrial and extractive industries, or potentially large scale agriculture. Areas with small scale residential development would potentially be more sensitive. Undeveloped areas with remote or wilderness characteristics would also be more sensitive.	Very limited settlement, restricted to scattered farmsteads. Agricultural activity has defined a landscape of simple large scale components. No sense of wildness. Minor roads. **Medium/Low**
Quality	This landscape has an open rural upland character and is broadly enclosed by the higher hills of character areas to the south and east. This forms the middle distance view from Carter Bar/ A68 English Border viewpoint forming a high quality view and first impressions of SBC. **Medium/ High**.	This is a measure of the condition and integrity of the landscape fabric and character. A landscape in good condition with a high degree of integrity is more likely to be sensitive to development. A landscape of poor quality may represent an opportunity to compensate for impacts.	The simple components of the landscape are unremarkable and in many places degraded or robust and functional. The hills form a receding component in the wide sweeping views from Carter Bar. **Low**
Elements and Features	There are simple enclosed grazing fields, some with shelterbelts and larger areas of commercial conifer plantations. There are a number of medium sized hills drained by burns and small rivers. There is also a larger number of historic sites with forts, settlements, Cairns and roman	The elements that make up a landscape, such as woodlands, fields, hedges, buildings and landforms create its pattern but add to its distinctive composition and character. Prominent or distinctive focal features such as steep hills, towers, lochs add further distinctiveness. The relationship of wind turbines to	Limited local interest around farm steadings with some broad leaved tree cover and occasional broad leaved tree belts. No overt contribution to local landscape character from local scheduled sites. Relatively bland landscape. **Low**

SPD Assessment		SPD – Factors Affecting Sensitivity (Table 3 Appendix 2)	SKM Analysis
	camp sites within the character area. Dere Street was a roman road, today this is a long distance footpath. **High**	these affects overall sensitivity.	
Context	There is locally large sized settlement to the north west (Jedburgh) that may have a view of the high points within the character area. High points to the east and south will look over this landscape. The majority of this area is sparsely populated. There will be views from the popular Carter Bar/ A68 English Border viewpoint over this landscape. **High**	The characteristics of surrounding landscape areas provide a context that affects perception of a landscape and may affect how wind turbine developments are perceived. Landscapes acting as a backdrop or foreground to other areas are particularly sensitive.	The site is well set back from scale comparators and is relatively discretely located however, the care taken during the design optimisation assists in the proposal reading in harmony with the scale and pattern of landscape features where visible. **Low**
OVERALL RATING	**Medium/ High**		**Low/Medium**

Table 2: Analysis of Visual Sensitivity

SPD Assessment		SPD – Factors Affecting Sensitivity (Table 4 Appendix 2)	SKM Analysis
Visual Sensitivity	**Criteria**		
Receptors	There are sparsely distributed individual farmsteads and dwellings with the occasional larger grouping of dwellings and a number of minor and more important A roads that will be receptors within this landscape. There is the Dere Street historical route, now a footpath, within this LCA and the popular Carter Bar/ A68 English Border viewpoint overlooking this landscape. This provides an important first impression of the Scottish Borders and Scotland from England. **High**	A greater number of potential receptors including higher population densities, visitor attractions or the presence of busy transport routes will lead to a higher visual sensitivity. The sensitivity and expectations of the receptors is also a contributory factor.	Sparsely settled area. Restricted visibility from A roads, Not Significant Distant visibility from Dere Street, Not Significant Direct visibility from Carter Bar, **Significant.** Overall - **Medium**
Internal Visibility	There are medium distance views within this landscape across the broadly sloping areas framed by the more rolling or gently undulating areas. The broad undulating landscape creates pockets of containment.	Views within a landscape area may be open or restricted by landform, vegetation or buildings. The greater the degree of openness and intervisibility the greater the sensitivity.	Locally relatively well contained visually discrete pocket of landscape which will limit and contain the local influence of the development and the immediate ancillary infrastructure. Local forestry plantations and tree belts provide further

SPD Assessment		SPD – Factors Affecting Sensitivity (Table 4 Appendix 2)	SKM Analysis
	Medium		containment to local views. **Low**
External Visibility	There will be views to and from the high points to the east and south that will overlook the character area, the town of Jedburgh to the north west may have limited views of the high points within the character area. There will be views over this landscape from the Carter Bar/ A68 England/ Scotland viewpoint. **High**	A landscape area that is visible from surrounding areas by virtue of its prominence or being overlooked is more visually sensitive than an area that is seldom seen.	Development will be visible from the surrounding higher hills with development seen to fit as an appropriate scale of development within the prevailing pattern of landscape features. **Medium**
OVERALL RATING	**Medium/ High**		**Low/Medium**

Table 3: Analysis of Landscape Value

SPD Assessment		SPD – Factors Affecting Sensitivity (Table 5 Appendix 2)	SKM Analysis
Landscape Value	**Criteria**		
Designations	The eastern area of the character area is within a larger SLA, the character area contains a number of SAMs and listed buildings. **Medium/High**	International, national, regional or local designations relating to landscape in particular, although ecological designations also contribute to the landscape value of an area.	The northern edge of the LCT falls into the Teviot Valleys SLA. This was designated against our advice in representations, which set out the reasons why this area of landscape did not contribute to the SLA designation. Local

SPD Assessment		SPD – Factors Affecting Sensitivity (Table 5 Appendix 2)	SKM Analysis
			SAMs **Medium**
Community value	The character area contains a number of cycle routes and core paths, this includes the Dere Street historical route. **Medium**	An undesignated area may be particularly valued by a community of interest: local, or activity-based.	Not a focal area for walking. **Low**
Cultural value	There are a number of historic sites, including a roman fort and sites of historic settlements, forts and cairns. The Carter Bar viewpoint on the England/ Scotland Border will provide views over this landscape and provide a first impression of Scotland to visitors. **High**	Valued landscapes will have historic associations, be rich in historic features and buildings and/or have literary or artistic associations.	Negligible historic interest locally. The hills are a component in views from Carter Bar and the proposed development has been designed to respond to this profile of Belling Hill. **Medium**
Perceptual	The landscape has an upland farmland character, perceived as rural and will provide a first impression of Scotland to visitors from the Carter Bar viewpoint on the English Border. High	Tranquillity, remoteness or wilderness are valued characteristics, whereas landscapes that are highly modified, developed and populated would have low value in this respect. Landscapes regarded as particularly scenic would also be more sensitive.	The landscape is undramatic, forming an element in the wider sweeping views seen from Carter Bar. The wind farm has been designed to be seen as a coherent element appropriate to the pattern and scale of the wider landscape elements. **Medium**
OVERALL RATING	**Medium/ High**		**Low/Medium**

3. Conclusions

The WECLCCI is a very conservative document and assigns very limited capacity to the region as a whole and tightens the consenting regime for the Scottish Borders going forward. The document is flawed as the statements of capacity can only be taken as a very general guide. The following key concluding points are highlighted:

Turbine Height: As the experience of landscape varies greatly it is not appropriate to apply strict guidelines on turbine heights that should be used for particular landscapes.

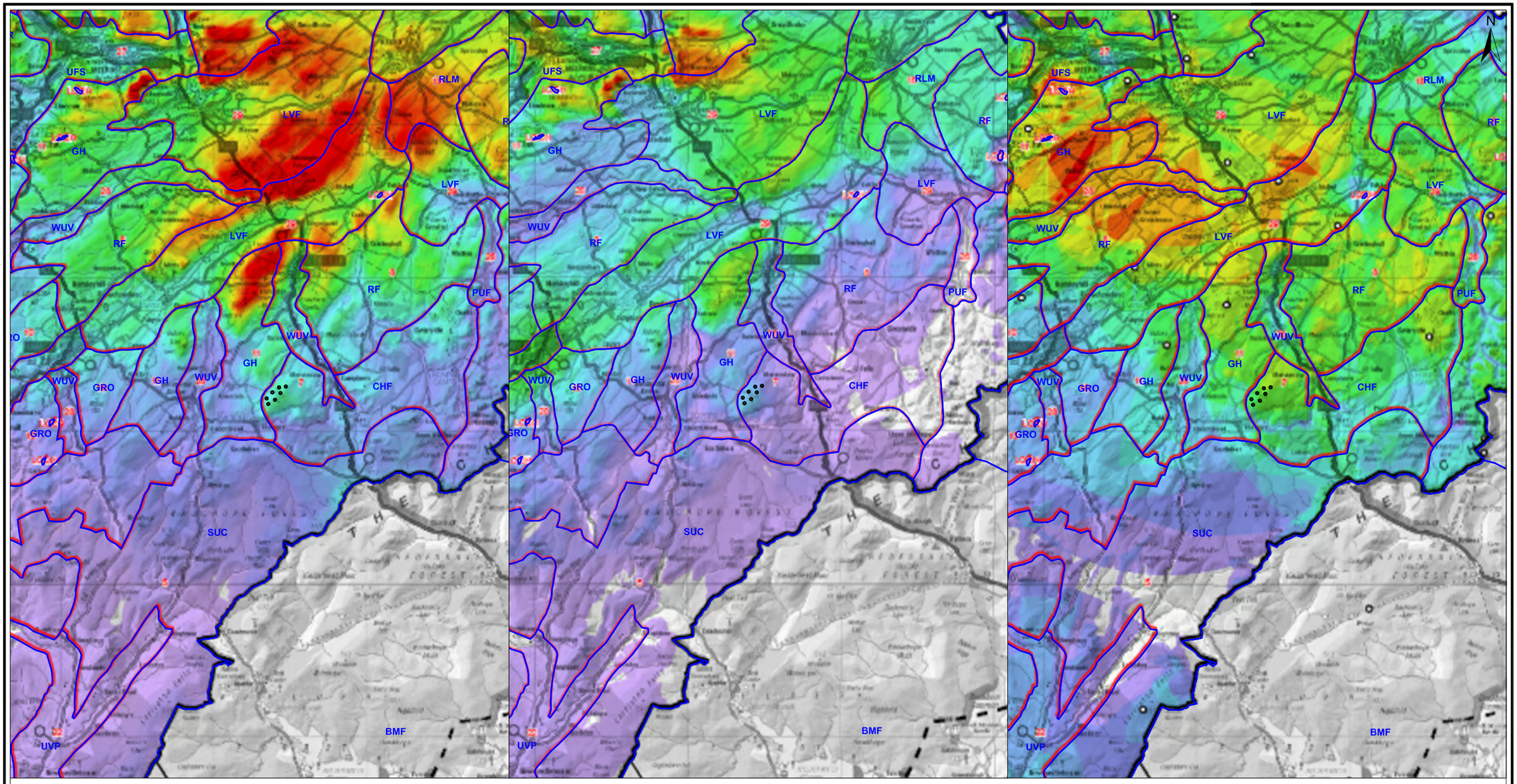
Landscape Accommodation: The WECLCCI focuses on a narrow upland type of landscape as being suitable for wind farm development. This is contrary to the principle of landscape accommodation which accepts that development may be allowed in a range of landscape types with an impact on the landscape locally but which fits within the landscape and does not change its character on a large scale. The document does not factor into consideration the possibility for a wind farm to be seen as a positive well designed addition to the landscape.

Landscape Character: Whilst there is a recognition in the WECLCCI that the capacity statements are broad brush and an average of the contributing elements assessed for the whole LCT and that "***any specific development should be considered in more detail and assessed against local factors where appropriate",*** this is not transparently carried forward to the SPD. Section 6.2.4 of the SPD and the capacity statements should more clearly acknowledge variations in landscape character occur within LCTs which may give rise to specific local capacity to accommodate development within a landscape contrary to the generic landscape capacity of the overall LCT.

Visual Sensitivity: A simplistic broad brush methodology is applied to assess general visual sensitivity which fails to acknowledge the relative sensitivities of visual receptors. The results of this exercise are given undue weight and are overvalued in the subsequent analysis which, in our view, skews the inherent capacity of the study area and reduces capacity.

It is our view that the document should be simplified to provide general pointers on the circumstances that would indicate landscape and visual capacity and leave the burden of proof to individual applications.

Appendix A. Figures



VISIBILITY FROM ROADS

VISIBILITY FROM SETTLEMENTS

VISIBILITY FROM VIEWPOINTS

CUMMINGS HILL WIND FARM

FIGURE 1

COMPARATIVE VISIBILITY
OF 150M HIGH STRUCTURES
FROM DIFFERENT RECEPTORS

SCALE	1:250,000 @ A3
CONTENT	CC
CHECKED	PD
PROJECT NO.	JE30619
DRAWN	CC
DATE	FEBRUARY 2014

KEY:

Highest Visibility

Lowest Visibility

CUMMINGS HILL TURBINES

SKM Review: Scottish Borders, LDP 2013, supporting documents: Wind Energy Consultancy; Landscape Capacity and Cumulative Impact

SKM ENVIROS

LOCATION: I:\JE\A\Projects\JE30619\Deliverables\Drawings\Envir\Dwg\JE30619-0000-NEP-DG-0049 - Visibility Comparisons.dwg