

## **EXECUTIVE SUMMARY**

### **Climate Change**

Climate change is no longer regarded as a myth. It is happening now and is one of the most serious threats to the environment and to man. Fossil fuel burning and other human activities are the drivers of climate change. To counter this threat the Scottish Government has embarked on an ambitious programme to exploit renewable energy as a sustainable solution. An initial target of 18 % renewable energy by 2010 is set to be achieved and has been superseded by a new target to supply 50 % of Scotland's energy demand from renewable sources by 2020.

### **Whitton Wind Farm**

Whitton Wind Farm would be part of the sustainable solution. The savings in harmful emissions would be in the order of 20,341 tonnes of carbon dioxide per year or 406,820 tonnes over the lifetime of the proposal. In addition, the proposal could meet the domestic needs of over 10,000 households in a clean and energy efficient way. These are the tangible, long-term benefits of this proposal.

In anticipation of this planning submission, an extensive assessment of the effects of the proposal has been undertaken and impartially reported within the accompanying Environmental Statement. Moving forward, the relevant planning test is one of 'acceptability' and it requires a decision to be based on an appropriate balance of such effects. Perceived harm must be weighed against the wider sustainable and longer term benefits of the proposal. In striking a balance decision makers should consider:

- responsible siting and design: the entire design process has been iterative and centred on minimising the scope for adverse effects. Where these were found, decisions were changed and layouts amended to minimise effects
- change can be acceptable: it is inevitable that the landscape will change given the scale of this proposal but change need not be viewed as adverse or negative. The fact development is visible does not equate to it being unacceptable
- wider social and economic benefits: the UK is becoming increasingly dependent upon energy imports from some nations considered to be politically and geographically unstable. Any interruption of supply would exacerbate issues of fuel poverty. Renewable energy helps broaden the nation's energy base and safeguard supply

### **This Planning Statement**

The purpose of this Planning Statement is to test the proposal and its effects against the policies of the Development Plan for compliance. This statement finds the proposal to be in broad compliance with the Development Plan. On this basis Vattenfall respectfully submit this planning application to Scottish Borders Council.

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## 1 INTRODUCTION

### 1.1 Purpose of the Planning Statement

- 1 This Planning Statement (the statement) has been prepared by Vattenfall Wind Power Ltd (Vattenfall) in support of the Whitton Wind Farm planning application. The planning application is submitted in accordance with The Town and Country Planning (Scotland) Act 1997 and The Environmental Impact Assessment (Scotland) Regulations 1999 as amended by the Environmental Impact Assessment (Scotland) Amendment Regulations 2007.
- 2 The relevant planning authority for determining the application is the Scottish Borders Council. In discharging this function The Town and Country Planning (Scotland) Act 1997, S25 requires the Scottish Borders Council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations.
- 3 This Statement does not form part of the Environmental Statement (ES) but should be read alongside the ES.

### 1.2 The Applicant

- 4 The applicant is Vattenfall Wind Power Ltd, a company registered in England and Wales (company number 06205750)<sup>1</sup>. Vattenfall Wind Power Ltd's ultimate parent company, Vattenfall AB (publ) is owned by the Swedish state. The Vattenfall AB group has a significant track record in the development and operation of wind farms in both the onshore and offshore sectors.
- 5 Vattenfall Wind Power's main objective is to become the fastest growing wind power developer and operator in Northern Europe. We are today operating in Sweden, Finland, Denmark, the United Kingdom, Germany and Poland. Through our recent acquisition of the Dutch energy company Nuon we also have operations in the Netherlands and Belgium. Our target is to increase the electricity production from wind power from 1 TWh to 49 TWh in 2030. This would provide renewable electricity to approximately 10 million homes.
- 6 The business consists of wind power development of a large number of projects and ownership of existing wind farms.
- 7 Vattenfall's primary strategic focus is making electricity clean. Our vision is to become climate neutral by eliminating the emission of greenhouse gases from our operations by 2050.

*'It is our task and our responsibility to work towards developing energy solutions that accord with sustainable development in society. It is not enough just to consider the environmental aspects of each individual energy solution. An energy system must contribute to sustainable development in society, not only from an environmental perspective, but also from social and economic perspectives. It must be able to meet today's needs without jeopardising the ability for future generations to meet theirs.'* Lars G Josefsson, CEO.

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<sup>1</sup> Vattenfall Wind Power Ltd was formerly named AMEC Wind Energy Limited. AMEC plc sold AMEC Wind Energy Limited (now Vattenfall Wind Power Ltd) to Vattenfall Vindkraft Aktiebolag on 6 October 2008

- 8 Hereinafter, references in this Planning Statement to the ‘applicant’ or ‘Vattenfall’ shall be deemed to be references to Vattenfall Wind Power Ltd.

### 1.3 The Proposed Development

- 9 The application site lies approximately 8 km east of Jedburgh in the Scottish Borders. It is located on privately owned land that is entirely under permanent pasture and is mostly improved or semi-improved grassland. The proposed development is described in detail in Chapter 4 (Volume 2). However, a summary of the key elements of the proposal is set out in Table 1.1 below to aid understanding and appreciation of the findings of this statement.

<b>Infrastructure</b>	<b>No.</b>	<b>Summary Description</b>	<b>Figure Showing Location (Vol 3)</b>	<b>Figure Showing Specification (Vol 3)</b>
Wind Turbines	6	Wind turbines of a nominal power output of up to 3 MW, with a height to tip of up to 110 m	4.2	4.3
Wind Turbine Hardstandings	6	Area for crane and component delivery vehicles at each wind turbine required for wind turbine erection, foundation construction and maintenance operations 20 m x 45 m	-	4.5
Wind Turbine Foundations	6	Reinforced concrete foundations typically square or circular up to 19 m diameter, and 2.6 m deep buried beneath the ground	-	4.4
Permanent Wind Monitoring Mast	1	70 m free standing monitoring mast fitted with anemometry and monitoring equipment at various intervals	4.2	4.8
8.1 km of Site and Access Roads (4.9 km new, 3.2 km upgrade existing)	-	Site roads on average 5 m in width.	4.2	-
Temporary Site Compound	1	Comprising temporary site accommodation, welfare facilities, parking and bunded storage area 60 m x 60 m	4.2	4.9
Control Building / Switchroom	1	Typically 14 m x 5 m compound consisting of a store/workshop, control room, switchroom and kitchen mess room (within a 18 m x 18 m footprint)	4.2	4.10
Borrow Pit	1	Sources of stone for the construction of roads and wind turbine foundations	4.2	-

- 10 The proposed wind farm is designed to have an operational life of 20 years.

- 11 The ES finds the Whitton Wind Farm proposal to be acceptable under the terms of the EIA Regulations and this Planning Statement concludes that the proposal is in compliance with the Scottish Borders Development Plan. Vattenfall therefore respectfully submits the planning application for the consideration of Scottish Borders Council.

## 2 ENERGY AND CLIMATE CHANGE POLICY

- 12 Adoption of the Kyoto Protocol in 1997 committed the UK to targets regarding the reduction of greenhouse gas emissions and the promotion of renewable energy use. The UK accepted a legally binding target of reducing greenhouse gases by 12.5 % below 1990 levels by 2012. The 2003 Energy White Paper set out the government's intention to expand its target set in 2000 of 10 % of electricity from renewable sources by 2010 to 20 % by 2020.
- 13 In March 2006 the government published its revised and updated Climate Change Programme. The document briefly summarises the findings of scientific research into climate change and its effects before setting out a strategy to reduce the UK's greenhouse gas emissions through a series of clear programmes for action in a number of broad sectors: energy supply, business, transport, domestic, agriculture, forestry and land management and public and local government.
- 14 In July 2006 the UK Government published the 'The Energy Challenge: Energy Review Report' which was a review of the 2003 White Paper. This review reiterated the UK Government's support for renewable energy, and in particular wind energy development, and defines the Government's long-term strategic vision for energy policy which combines the UK's environmental, security of supply, competitiveness and social goals.
- 15 The Energy Review expressed concern with the slow pace of renewable energy development, identifying the planning process as one of the blockages. The Review recognises that *'it has been difficult for decision-makers to balance global and national benefits associated with major renewable energy development with what may be significant local impact and local objections. The wider benefits to society and the economy as a whole are not always visible to the specific locality and local opposition can therefore be strong'*.
- 16 In order to clarify the relative significance of Government policies and the balance of priorities the 'Renewables Statement of Need' was published as an annex to the Energy Review.
- 17 The Energy White Paper 'Meeting the Energy Challenge', published in 2007, sets out the UK Government's international and domestic energy strategy, and how the Government is implementing the measures identified in the Energy Review and as well as those announced since 2006. A clear statement of Government policy, the strategy set down in this document contains a number of key elements of relevance to the consideration of this planning application.
- 18 Under the heading of 'planning' the White Paper sets down how the Government expects the planning system to respond. In relation to commercial wind energy developments the Government's actions are as follows:
- underlining that applicants will no longer have to demonstrate either the overall need for renewable energy or for their particular proposal to be sited in a particular location; and
  - giving a clear steer to planning professionals and local authority decision makers, that in considering applications they should look favourably on renewable energy developments

- 19 The White Paper goes on to place into policy, the 'Statement of Need' previously published in the Energy Review.
- 20 In May 2007 the UK Government published the 'Planning for a Sustainable Future' White Paper which directly addresses the role of the planning system in delivering infrastructure developments which support a secure energy supply and reduce carbon emissions. This document states directly the need for the planning system to provide access to clean, affordable energy alongside the need to protect the natural and historic environment. Paragraph 1.14 of the White Paper sets down some key challenges which the planning system must face. Those of relevance here are:
- meeting the challenge of climate change; and
  - maintaining security of energy supply
- 21 In March 2007 the UK Government published a draft Climate Change Bill, which received Royal Assent on 26 November 2008. The Climate Change Act reiterates the government's commitment to the role of wind energy as an important aspect of the move to a low carbon economy.
- 22 In October 2008 the UK Government committed to increase the carbon reduction target from 60 % to 80 % of 1990 levels by 2050. This was in line with the recommendations of the Government appointed Committee on Climate Change and is included in the Climate Change Act. This action signals the Government's recognition of the scale of action required to combat Climate Change.

## **2.1 The Position in Scotland**

- 23 Since devolution in 1999 the Scottish Government has been able to implement policies in many areas that were previously controlled by Westminster. The UK Government is responsible for setting the direction of energy policy in the UK as a whole but the Scottish Parliament has devolved authority over matters of policy implementation, including renewable energy, in Scotland. This has allowed Scottish Ministers to implement various initiatives to help take advantage of Scotland's wealth of renewable resources.
- 24 The Scottish Climate Change Programme, published by the Scottish Executive in November 2000, recognised the enormous potential for the development of renewable energy sources in Scotland. Whilst supporting the UK target of meeting the 10 % of UK electricity demand from renewables by 2010, the Scottish Executive further increased the target and committed Scotland to generating 18 % of its electricity from renewable sources by 2010.
- 25 In August 2002 the Scottish Executive launched a consultation paper 'Scotland's Renewable Energy Potential – Beyond 2010: Consultation Paper' to look at Scotland's renewable potential beyond 2010 and to seek views on the whether there was value in adopting a target of 40 % for 2020.
- 26 In March 2003 the Scottish Executive published 'Securing a Renewable Future: Scotland's Renewable Energy' in which proposals were set out to help make a 40 % target by 2020 possible. In addition, there was focus on promoting public awareness of renewable energy and establishing a Forum for Renewable Energy Development in Scotland.

27 In September 2005, the Scottish Executive published a report by the Forum for Renewable Energy Development in Scotland (FREDS) entitled 'Scotland's Renewable Energy Potential: Realising the 2020 target'. It stated that by the end of April 2005 about 2.8 GW of renewable development was operating or consented in Scotland, and it estimated that a further 3.4 GW was needed to reach the 2020 target of 6 GW.

28 It also noted that this figure needs to be reviewed on a regular basis and most notably:

*'that sustained onshore wind development will continue to play a leading role in achieving targets but that the importance of developing emerging technologies for future generation should not be underestimated' and that 'Onshore wind should not be constrained within the 6 GW target'.*

29 A key conclusion, set out at paragraph 37, is that:

*'Unlike the position in England and Wales, Scotland has already achieved the number of consents which would, if all implemented, equate to the target figure of 18 % of the total Scottish electricity consumption by 2010. That has been achieved through the construction of about 568MW of onshore wind energy installed capacity to date, with a further 523MW under construction onshore as at April 2006, and with consents under the Electricity Act or the Planning Act providing a further 1155MW.*

*However, the overall UK target of 10% by 2010 remains to be met as our commitment to the European targets and as part of the global dimension to the problem of Climate Change. In any event, Scottish Government are already looking towards the 2020 figures for Scotland cited above and ...they are confident of meeting the target ahead of schedule.'*

30 In November 2007 the Scottish Government went on to set a target of 50 % of the demand for Scottish electricity to be supplied from renewable sources by 2020, with an interim milestone of 31 % by 2011.

31 In December 2008, the Scottish Government introduced the Climate Change Bill. The Bill, which was passed in June 2009, will create a long-term framework that will:

- introduce a statutory target to reduce Scotland's greenhouse gas emissions by at least 80 % by 2050
- establish an interim target of at least 42 % emissions reductions by 2020, with a power for this to be varied based on expert advice from the UK Committee on Climate Change
- establish a framework of annual targets; and
- include emissions from international aviation and international shipping

### **3 PLANNING POLICY & OTHER MATERIAL CONSIDERATIONS**

#### **3.1 The Development Plan**

32 Section 25 of the Town and County Planning (Scotland) Act 1997 requires decision makers to have regard to the Development Plan in the determination of planning applications. A determination must accord with the Development Plan unless material considerations indicate otherwise.

33 The Development Plan for the proposal area comprises the Scottish Borders Structure Plan (approved 2002) and the Scottish Borders Local Plan (adopted September 2008).

34 The proposal has been tested for compliance with all relevant policies of the Development Plan and policy compliance is set out in detail in section 4 of this statement: Assessment of Acceptability.

##### ***3.1.1 Dominant Theme of the Development Plan***

35 Whitton Wind Farm is a proposal to generate renewable energy and the policies of prime planning importance in the Development Plan are therefore those concerned with renewable energy.

36 Structure Plan Policy I19 and Policy I20 and Local Plan Policy D4 are the most relevant policies for the consideration of renewable energy development proposals. They constitute a 'dominant theme' in the Development Plan with regard to wind energy proposals and should be given primary consideration in the determination process.

37 The Development Plan includes a range of planning policies relevant to the development of renewable energy in general, and wind energy in particular, along with a raft of other policies also of relevance to this proposal.

38 Table 3.1 below lists the key development plan policies relevant to the proposed wind farm development including those constituting the dominant theme.

<b>TABLE 3.1 Relevant Development Plan Policies</b>			
<b>Dominant Theme of the Development Plan</b>			
<b>Policy Areas</b>	<b>Structure Plan</b>	<b>Local Plan</b>	<b>Relevant section of ES</b>
Sustainable Development	Principal Aim Principle S1	Principle 1	Chapters 5-20
Renewable Energy	Policy I19 Policy I20	Policy D4	Chapters 6-20
<b>Other Relevant Development Plan Policies</b>			
Landscape Protection	Policy N9 Policy N10 Policy N11 Policy N13	Policy D4 Policy EP1 Policy EP2	Chapter 8
Nature Conservation	Policy N1 Policy N2 Policy N3 Policy N4 Policy N5 Policy N6 Policy N7 Policy N8	Policy NE1 Policy NE2 Policy NE3 Policy NE4 Policy NE5	Chapters 10 & 11
Archaeology & Cultural Heritage	Policy N14 Policy N15 Policy N16 Policy N17	Policy BE1 Policy BE2	Chapter 9
Access and Recreation		Policy Inf2	Chapter 15
Economic Development	Policy E16 Policy E22		Chapter 15
Hydrology, Private Water Supplies & Fisheries	Policy I13 Policy I14 Policy N8	Policy NE5 Policy NE6	Chapters 13 & 14
Transport & Traffic		Policy D4	Chapter 7
Nuisance	Policy I20	Policy D4	Chapters 16, 17 & 19
Aviation	Policy I20	Policy D4	Chapter 18

39 These policy areas are considered in relation to Development Plan policy and material considerations in Section 4.

### 3.2 Other Material Considerations

40 The Development Plan should guide, rather than dictate, the decision making process. The plan should provide a context within which an assessment of overall acceptability can be made having regard to the 'dominant theme' of renewable energy policy and other material considerations which can include:

- Government statements, policies and advice notes
- Supplementary Planning Guidance notes
- views of statutory consultees and other stakeholders
- wider benefits of proposals
- community engagement

41 These material considerations are considered in more detail below.

### **3.2.1 Government Statements, Policies and Advice Notes**

#### **3.2.1.1 The National Planning Framework 2**

- 42 The National Planning Framework (NPF2) provides the long term strategy for the development of Scotland over the next 25 years and is a material planning consideration in the production of development plans and in the determination of planning applications.
- 43 The NPF2 builds on the first National Planning Framework and will play a key role in co-ordinating policies with a spatial dimension and aligning strategic investment priorities. It is concerned with Scotland in its wider context and addresses the major contemporary challenges of global competition, climate change and resource depletion.
- 44 NPF2 is broken down into key topic areas, specifically: Key Challenges, Scotland – 2030, Infrastructure, Spatial Perspectives and Making it Happen. In relation to this application there is a clear presumption in favour of renewable energy with NPF2 recognising that substantial reductions in greenhouse gas emissions will be necessary to minimise the impacts of Climate Change and that taking no action would have significant adverse effects on the environment and the lifestyles we currently enjoy.
- 45 A key aim for Scotland's spatial development to 2030 includes promoting a greener Scotland by contributing to the achievement of climate change targets and protecting and enhancing the quality of the natural and built environments and to realise the potential of Scotland's renewable energy resources and facilitate the generation of power and heat from all clean, low carbon sources.
- 46 In relation to infrastructure and renewable energy NPF2 recognises that parts of the electricity transmission network need to be strengthened if we are to realise the potential of our renewable energy resources. The Scottish Government is committed to working towards deriving 20% of total energy use from renewable sources by 2020 and states that hydro-power and onshore wind are the renewable technologies likely to make the largest contributions initially with other technologies making a greater contribution to the energy mix as technology improves.
- 47 The National Planning Framework is supported by the Scottish Planning Policy and Planning Advice Notes (PAN).

#### **3.2.1.2 Scottish Planning Policy**

- 48 The Scottish Government is rationalising national planning policy by replacing the current series of SPPs and NPPGs with a single SPP. The consolidated SPP will provide a shorter, clearer and more focused statement of national planning policy.
- 49 In October 2008, SPP1 *The Planning System* was replaced by the initial sections of the consolidated SPP namely:
- Part 1: The Scottish Government's view of the purpose of planning; and
  - Part 2: the core principles for the operation of the system.

- 50 The remaining sections of the consolidated SPP, specifically the thematic policies, were published for consultation in April 2009 with final comments to be submitted by June 2009. Until the final consolidated SPP is published at the end of 2009, the existing SPPs and NPPGs remain in force.
- 51 Although not formally adopted as government policy it is worth noting that, with regard to renewable energy, the consultation draft of the consolidated SPP advises that development plans should support all scales of development associated with the generation of energy from renewable sources, ensuring that an area's renewable energy potential is realised in a way that takes account of relevant economic, social, environmental and transport issues.
- 52 In addition the draft SPP includes a specific section on wind farms in which there is a presumption in favour of wind farms subject to environmental and cumulative impacts being satisfactorily addressed. The SPP advises that development plans should include criteria based policies for determining wind farm applications and decisions should not be unreasonably delayed because other schemes in the area are at a less advanced stage in the application process. The weight that planning authorities attach to undetermined applications should reflect their position in the application process.

### 3.2.1.3 Existing SPPs and NPPGs

- 53 Until the full SPP is published, the existing thematic policy series contained within the NPPGs and SPPs series will remain relevant. This series provides statements of Scottish Government policy on nationally important land use and other planning matters, supported where appropriate by a locational framework. NPPGs and SPP's identify key priorities for the planning system and may, so far as relevant, be material considerations to be taken into account in development plan preparation and in development management decisions.
- 54 The following NPPGs and SPPs are considered relevant to the Whitton Wind Farm proposal.
- SPP2 Economic Development (2002)
  - SPP6 Renewable Energy (2007)
  - SPP7 Planning and Flooding (2004)
  - NPPG14 Natural Heritage (1999)
  - SPP15 Planning for Rural Development (2005)
  - SPP17 Planning for Transport (2005)
  - SPP23 Planning for the Historic Environment (2008)
- 55 Planning Advice Notes (PAN) provide advice on good practice and other relevant information supporting the policies within NPPGs and SPPs. A list of relevant PANs is provided below.
- PAN 42 (January 1994) Archaeology – The Planning System and Scheduled Monument Procedures.
  - PAN 45 (revised January 2002) Renewable Energy Technologies.
  - PAN 51 (revised 2006) Planning and Environmental Protection.
  - PAN 56 (April 1999) Planning and Noise.
  - PAN 58 (September 1999) Environmental Impact Assessment.

- PAN 60 (updated January 2008) Planning for Natural Heritage.
  - PAN 68 (August 2003) Design Statements.
  - PAN 69 (August 2006) Flooding
  - PAN 73 (February 2005) Rural Diversification
  - PAN 81 (March 2007) Community Engagement – Planning with People
- 56 SPP6 Renewable Energy is the planning policy guidance most relevant to the proposal. SPP6 unequivocally states that ‘tackling climate change should be seen as the principle challenge of sustainable development’.
- 57 The intention of SPP6 is to facilitate achievement of the Scottish Government’s 2020 target of generating 40% (6 GW) of Scotland’s electricity demand from renewable sources by 2020. Scottish Ministers reaffirmed the target in the 2005 FREDS report ‘Scotland’s Renewable Energy Potential: Realising the 2020 target’ and confirmed that this figure should not be regarded as a cap on development. Furthermore, the Government’s expectation is that sufficient developments should be consented, at minimum, to enable achievement of the 2020 target several years ahead of schedule.
- 58 SPP6 recognises that during the lifetime of the SPP *‘onshore wind power is likely to make the most substantial contribution towards meeting renewable targets.’* Annex A of the SPP sets out the considerations that should be taken into account when drawing up a spatial framework for the consideration of wind farms over 20 megawatts. However the SPP states clearly that *‘this framework should not be used to put in place a sequential approach to determining applications’.*
- 59 SPP6 also provides the freshest thinking of Scottish Ministers with regard to the need for an over-riding public interest. It states *‘tackling climate change should be seen as the principle challenge of sustainable development’.* It recognises that there is no bigger challenge that faces us than climate change and the need for action is urgent.
- 60 SPP6 recognises the more competitive positions of wind farm technology in comparison to other types of renewable technology. This is particularly relevant in Scotland, which has the best wind resource in Europe. Recognition of all types of renewable energy is encouraged, particularly for the long term, however it is stated that in all instances:
- ‘...applications should be assessed in relation to criteria based policies to provide clarity on the issues that must be addressed to enable development to take place.’*
- And importantly;
- ‘Spatial policies should not be used to restrict development on sites where the technology can operate efficiently and environmental and other impacts can be addressed.’*
- 61 In conclusion, SPP6 is highly supportive of the principle of the proposed development, subject to consideration of the development’s location and form.
- 62 PAN45, revised in January 2002, accompanies SPP6 and provides information on renewable energy technologies and advice for handling these

as planning issues in development plans and planning applications. Paragraphs 36 to 93 of PAN45 describe wind power technology and issues related to the production of electricity using wind power which need to be addressed by both developers and planning departments. These include:

- safety
- electromagnetic interference
- noise
- shadow flicker
- siting in the landscape
- birds and habitats
- cumulative effects
- decommissioning, re-equipping and replacement
- requirements for undertaking Environmental Impact Assessments of wind energy proposals

- 63 PAN45 emphasises the need for a pragmatic approach to assessing the acceptability of wind farm proposals: *'there are few landscapes where a wind farm will not be a new distinctive feature. However, society at large has to accept wind turbines as a feature of the Scottish landscape for the foreseeable future'*.

### **3.2.2 Supplementary Planning Guidance**

- 64 The former Borders Regional Council produced a 'Planning Framework for Wind Energy Developments' in 1995. This document, referenced in Structure Plan Policy I19, is still being used for assessing the appropriateness of wind energy developments and therefore constitutes a material consideration to the decision. However it is recognised by the Scottish Borders Council that technical and economic constraints have changed since it was written and the 'Areas of Search' methodology used in the 'Framework' document has been modified.
- 65 Two significant strategic issues have not been covered by the methodology – cumulative impact and landscape character. The Council consider that these issues need to be addressed on a site by site basis. Chapter 8 (Volume 2), Landscape and Visual Impact Assessment, considers both of these issues.

### **3.2.3 Views of Statutory Consultees and Other Stakeholders**

- 66 In February 2008, a 'Request for an Environmental Impact Assessment Scoping Opinion' was made to Scottish Borders Council for a proposed wind farm at Whitton (see Appendix 1B (Volume 5)).
- 67 Table 1.4 in Chapter 1 (Volume 2) provides a summary of the main issues raised by consultees during the scoping process and indicates where in the ES the issue has been addressed.
- 68 The influence of feedback on siting and design is evident in the evolution of the proposal. Since inception, the size of the potential developable area has not changed. However, by acting on the feedback received during the EIA process, Vattenfall have reduced the overall size of the project from 10

turbines to six, primarily to improve its visual containment within the landscape and achieve a more visually balanced layout.

### ***3.2.4 The Wider Benefits of the Proposal***

- 69 SPP6 advises that the wider social, environmental and economic benefits that may be realised at the local, regional or national scale, should be given weight in the determination process.
- 70 Renewable energy proposals are seen as a critical plank in the Scottish Government's attempt to reduce carbon emissions and adapt to the onset of climate change. As such, wider benefits have the potential to be significant, tangible and long term. The key beneficial effects are set out below.

#### ***3.2.4.1 Social Benefits***

- 71 SPP6 sees renewable energy as part of a sustainable way of living that will best provide for the long term health of Scotland's population, the quality of life and protection of property through mitigation of the effects of climate change.
- 72 However, any assessment of social benefit should go wider and should recognise the contribution of renewable energy to addressing issues such as the future affordability of energy, the future security and supply of food, the effects of climate change on human health and settlement.

#### ***3.2.4.2 Environmental Benefits***

- 73 Climate change is predicted to have severe negative impacts on habitats and species around the globe. The composition and geographic distribution of ecosystems will change as individual species respond to new conditions created by climate change. At the same time, habitats may degrade and fragment in response to secondary human pressures. Species that cannot adapt quickly enough may become extinct; an irreversible loss.

#### ***3.2.4.3 Economic Benefits***

- 74 This proposal has the potential to create a number of employment opportunities during the construction period and sustain existing jobs within the Scottish Borders economy supply chain.
- 75 During the construction period contractors will be encouraged to use local businesses for all materials and services. This will provide a short-term boost to the local economy.
- 76 The proposal will assist with the UK Government's aim of encouraging indigenous supply of energy to create security of supply. The UK's dependency on external energy continues to increase. Such dependency and the accompanying lack of control over supply and price places the UK in an increasingly vulnerable position.

### **3.2.5 Community Engagement**

- 77 The proposal has been submitted in accordance with the provisions of PAN 81: Community Engagement – Planning with People. Chapter 5 (Volume 2) presents Vattenfall's approach to community engagement in relation to the Whitton Wind Farm proposal. It explains how Vattenfall has engaged with the community prior to submission of this planning application, discusses the feedback received during this process and the extent to which this has influenced the final scheme.

### **3.2.6 Summary**

- 78 The energy produced by the proposal would displace the traditional forms of combustion based energy generation that are now accepted as major emitters of carbon dioxide, a key driver of climate change. Renewable energy sources will therefore help prevent, stabilise or even reverse the adverse effects of climate change.
- 79 In the opinion of the Applicant, the principle of planning policy at the national and local level is supportive of a proposal of this size and scale in this location. Whether it is ultimately judged to accord with Development Plan policy will depend upon a number of site specific considerations that are examined in Part 4 of this statement.

## 4 COMPLIANCE WITH THE DEVELOPMENT PLAN

80 This section of the Planning Statement assesses the extent to which the Whitton Wind Farm proposal accords with the policies of the Scottish Borders Development Plan, taking account of any other material considerations. The Development Plan for the proposal area comprises:

- Scottish Borders Structure Plan (2002)
- Scottish Borders Local Plan (2008)

### 4.1 Sustainable Development Policy

#### 4.1.1 *The Development Plan*

##### 4.1.1.1 Structure Plan

81 The Scottish Borders Structure Plan enshrines the principle of sustainability at its core. It recognises the role the planning system can play in the pursuit of sustainable development and adopts the Brundtland definition that *'sustainable development is development which meets the needs of the present without compromising the ability of future generations to meet their own needs'*.

82 Principle S1 Environmental Impact is the core principle relating to sustainability. It states that *'Proposals for substantial development will be assessed against relevant sustainability criteria with the aim of minimising harmful environmental impacts and moving towards sustainable development.'*

##### 4.1.1.2 Local Plan

83 The Scottish Borders Local Plan is founded upon the basic premise of supporting and encouraging sustainable development in accordance with the Council's Environmental Action Plan and the need for action on Climate Change.

84 Principle 1 Sustainability underpins all the policies of the plan. In determining planning applications, the Council will have regard to all aspects of Principle 1 and developers are expected to incorporate the sustainability principles into their developments.

### 4.1.2 *Assessment of Compatibility*

#### 4.1.2.1 Renewable Energy Generation

85 Wind energy proposals should be considered sustainable *in principle* on the following grounds:

- **Carbon Reduction** - Energy from wind turbines replaces the production of harmful greenhouse gases from the more conventional fossil fuel burning power stations we currently rely upon.

- **Zero Emissions** - Wind turbines do not produce harmful emissions or unwanted by-products. The Danish Wind Turbine Manufacturer's Association calculated that a typical wind farm repays its 'energy debt' (accrued during the manufacture and installation process) in 3 to 5 months from the point of first generation. A performance unmatched by any fossil fuel dependent form of energy generation or nuclear
- **Prudent Use of Resources** - Wind turbines have a very small physical footprint compared to the more traditional power stations. This means they do not sterilise land or blight the use of surrounding land.

86 However, it is also important to consider the manner in which the project is undertaken *in practice* to ensure that it fully meets the sustainability objectives of the Development Plan. Vattenfall are keenly aware of the social, economic and environmental responsibilities of wind farm development and aim to be at the forefront of best practice in the planning, construction, operation and decommissioning of wind farm development.

87 Chapters 5 to 20 (Volume 2) explain the practical steps Vattenfall is taking to address the sustainability principles set out in the Development Plan. The principal mechanisms employed to ensure the development is undertaken in a locally sustainable way are:

- an Environmental Management Plan (described in Chapter 20 (Volume 2))
- a Habitat Management Plan (Appendix 11F (Volume 5))
- a Community Engagement Strategy for the lifetime of the development (Appendix 5A (Volume 5))
- a Local Procurement Policy
- an Outline Decommissioning Method Statement to restore the site following 20 years of operational life (Appendix 20A (Volume 5))

#### 4.1.2.2 Carbon Balance

88 Chapter 12 (Volume 2) presents a carbon balance assessment for the Whitton Wind Farm proposal.

89 Some wind farm developments can affect carbon dynamics from the disturbance of carbon-rich soils, such as peat, or from the clearance of forested areas, both in themselves major global stores of carbon (SNH 2003, Nayak *et al.* 2008). However, the Whitton Wind Farm proposal would be located outside such areas and a more simple approach to calculating the carbon balance has been taken, largely based on a British Wind Energy Association (BWEA) methodology.

90 The assessment concludes that Whitton Wind Farm would displace the emissions produced by more conventional fossil fuel burning power stations, contributing to the Government's CO<sub>2</sub> reduction targets. The savings in CO<sub>2</sub> emissions compared with equivalent energy generation from fossil fuel are estimated to be between 13,560 and 20,341 tonnes of CO<sub>2</sub> per year, depending on the generating capacity of the wind turbines installed.

#### 4.1.2.3 Decommissioning

- 91 The wind farm has been designed to have an operational life of 20 years. After this time the site could be reinstated and the visible infrastructure removed. The site access roads would remain in place in order to facilitate ongoing estate operations. More details on decommissioning are given in ODMS – Decommissioning, Appendix 20A (Volume 5).

#### 4.1.3 **Conclusion**

- 92 The mechanisms adopted by Vattenfall to implement sustainable development in practice ensure that the proposal conforms to the Development Plan.

### 4.2 **Renewable Energy Policy**

#### 4.2.1 ***The Development Plan***

##### 4.2.1.1 Structure Plan

- 93 Policy I19 and Policy I20 are the most relevant Structure Plan policies for the consideration of renewable energy development proposals and should therefore be given primary consideration in the determination process.
- 94 Structure Plan Policy I19 Renewable Energy recognises that the Scottish Borders has considerable potential to generate renewable energy and anticipates that the region will soon become a net exporter of energy from renewable sources. It states that *'The Council supports the development of renewable energy sources that can be developed in an environmentally acceptable manner'*.
- 95 Structure Plan Policy I20 Wind Energy Developments defines the specific criteria against which wind energy developments will be assessed. Preferred areas for wind energy development are identified as those areas outside any environmental designation. However this methodology does not address the potential for cumulative impact and impact on landscape character which must be considered on a site by site basis.

##### 4.2.1.2 Local Plan

- 96 Local Plan Policy D4 sets the dominant theme of the plan with regard to wind energy proposals. It states that the Council will support proposals for commercial wind farms where they can be accommodated without unacceptable impacts on the environment.
- 97 The policy provides further locational guidance for commercial wind farm development. Large scale landscape settings defined as Upland type in the Borders Landscape Assessment will normally be more acceptable than other character types. Visual containment of the development is also important and particular attention will be given to the potential effects on high sensitivity visual receptors such as major tourist routes and important landscape viewpoints.

#### **4.2.2 Assessment of Compatibility**

- 98 The Layout and Design Optimisation section of Chapter 8 (Volume 2) demonstrates how Vattenfall have minimised the impact of the wind farm by developing a 'best fit' design for the site.
- 99 Local Plan policy D4 states that large scale landscapes defined as 'Upland' will *normally* be more acceptable for wind energy development than other landscape character types. However Policy D4 goes on to say that locations where there is surrounding landform that minimises the external visibility of the development, where there is no interference with prominent skylines or where there is no conflict with sensitive habitats will be looked on more favourably than other locations.
- 100 The Whitton wind farm proposal is located within a large scale landscape setting defined as 'upland fringe' rather than 'upland'. Visibility mapping and viewpoint analysis, presented in Chapter 8 (Volume 2), indicate that the wind farm will not be significantly visible from major tourist routes and important landscape viewpoints and that views from settlements other than the village of Morebattle are limited or do not occur. Furthermore, the effects on prominent skylines are also limited.
- 101 The landscape and visual assessment presented in Chapter 8 (Volume 2) concludes that the proposal is a small scale wind farm development located in a medium sensitivity farmland landscape with limited significant effects.

#### **4.2.3 Other Material Considerations**

##### **4.2.3.1 SPP6 and PAN45**

- 102 SPP6 and PAN45 promote renewable energy development on the grounds that it is clearly in the national public interest. This motive should carry considerable weight. SPP6, in particular, makes it clear that Ministers '*expect*' sufficient development to meet the 2020 target '*several years ahead of schedule*'.
- 103 SPP6 Annex A advises that development plan policies should be based on the principle that wind farms should be accommodated where the technology can operate efficiently and environmental and cumulative impacts can be addressed satisfactorily.
- 104 Wind energy development is, by its nature, difficult to hide. National and local planning policies recognise this and accept it. They look beyond issues of local impact and to consider the national need for renewable energy and the need for it to follow the wind resource to open and remote locations.
- 105 PAN45 states '*There are no landscapes into which a wind farm will not introduce a new and distinctive feature. Given Scottish Ministers' commitment to addressing the important issue of climate change and the contribution expected from renewable energy developments, particularly wind farms, it is important for society at large to accept them as a feature of many areas of Scotland for the foreseeable future.*'

#### **4.2.4 Conclusion**

- 106 The proposal seeks to authorise the installation of a renewable energy generating facility. In principle, this proposal is in compliance with the renewable energy policies of the Development Plan seeking to promote such development.
- 107 Therefore, although no conflict may arise in principle, Vattenfall accept that the siting and design of the proposal must also be shown to be acceptable. The merits of the proposal across all relevant environmental, social and economic topic areas will be made in the remaining sections of this statement.
- 108 In conclusion, based upon the renewable energy credentials of the proposal and the raft of other material considerations in the form of Scottish Government planning policy, the proposal is considered to be in accordance with the Development Plan.

### **4.3 Landscape & Visual Effects**

#### **4.3.1 The Development Plan**

##### **4.3.1.1 Structure Plan**

- 109 The landscape policies of the Scottish Borders Structure Plan seek both to protect areas covered by landscape designations and to conserve the character of the wider landscape.
- 110 Structure Plan Policy N9 aims to maintain landscape character and enhance its quality. Landscape character is defined by the Landscape Character Network as '*a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse*'.
- 111 Policy N10 is concerned with development in National Scenic Areas (NSA) and aims to ensure that the objectives of designation and overall landscape value of the site will not be compromised by development.
- 112 Policy N11 concerns development in Areas of Great Landscape Value (AGLV). It aims to safeguard landscape quality in AGLVs and will have particular regard to the landscape impact of the proposed development. '*Proposals that have a significant adverse impact will only be permitted where the impact is clearly outweighed by social or economic benefits of national or local importance*'.
- 113 Policy N13 is concerned with the protection of the landscape features, character and setting of sites listed in the Inventory of Gardens and Designed Landscapes.

##### **4.3.1.2 Local Plan**

- 114 Policy D4 of the local plan provides further advice on the location of commercial wind farms. It states that locations within large scale landscape

settings defined as Upland type in the Landscape Classification hierarchy will normally be more acceptable than other character types. It also points to the desirability of finding locations where the surrounding landform minimises the external visibility of the development.

- 115 Policy EP1 the Scottish Borders Local Plan supports Structure Plan Policy N10.
- 116 Policy EP2 of the Scottish Borders Local Plan reinforces Structure Plan policy N11.
- 117 Policy BE3 aims to protect the character of Gardens and Designed Landscapes from development that would damage their special character.

#### **4.3.2 Assessment of Compatibility**

- 118 Chapter 8 (Volume 2) addresses the potential landscape and visual impact of the proposed wind farm within 35 km of the development.
- 119 The application area is situated within a large scale upland fringe landscape, comprising rolling farmland and grassland, which lies between a patchwork of intensively farmed land to the north and the Cheviot Hills to the south. Under the landscape character classification system adopted by SNH, this landscape type is determined to be 'Upland Fringe: Rolling Farmland' (The Scottish Borders Landscape Character Assessment 1997). This character unit is considered to be of medium value and medium sensitivity to change associated with the proposed wind farm.
- 120 The site is not within the Policy D4 preferred landscape type defined as 'Upland' in the Borders Landscape Assessment, it is in a large scale landscape setting which detailed assessment of the site, as presented in the ES, has shown can accommodate wind farm development.
- 121 With regard to SNH's Policy Statement 02/02 – Strategic Locational Guidance for Onshore Wind Farms in Respect of the Natural Heritage, the proposed wind farm falls within Zone 1 Lowest Sensitivity.
- 122 The assessment concludes that the proposed wind farm at Whitton has been designed to be a strong and positive statement within the landscape, but respectful of the scale of the receiving landscape and key locations where it would be viewed. The design has incorporated standard mitigation measures in relation to the design of the wind turbines and site specific mitigation measures.
- 123 The proposed wind farm does not significantly impact any important landscapes and is sited in landscape character types/areas that have been identified as having scope for wind energy development. Furthermore, although prominent from some locations, it would be viewed in a wider context in such a way that it would not be viewed as a dominant and overbearing development.
- 124 Of the viewpoints assessed, possibly the most sensitive is recognised as being the visitor stop at the Carter Bar on the Scottish/English Border. This viewpoint affords vast and expansive views to the north over the Borders region towards the Lammermuir Hills. A 'not significant' effect was

determined at this location due to the expansiveness of the view, the distance of the wind farm from the location, and the principal focus of the view being to the north. It is acknowledged that there are limited built structures within this landscape that are readily apparent and that the wind farm would add a new and 'dynamic' element to the view; however the simple design and relatively small scale of the wind farm would be effectively absorbed into the wide and diverse view.

- 125 With regard to Structure Plan Policy D4, the assessment concludes that the proposed wind farm is a small scale wind farm development located in a medium sensitivity farmland landscape with limited significant effects. Visibility mapping and viewpoint analysis indicate that the wind farm will not be significantly visible from major tourist routes and important landscape viewpoints and that views from settlements other than the village of Morebattle are limited or do not occur. Furthermore, the effects on prominent skylines are also limited.

### **4.3.3 Other Material Considerations**

#### **4.3.3.1 SPP6**

- 126 SPP6 stresses the importance of the planning system in resolving conflicts so that appropriate protection can be given to the natural and historic environment without unreasonably restricting the potential for renewable energy development to contribute towards the government's 2020 target.

#### **4.3.3.2 PAN45**

- 127 PAN45 is more compelling and advises that wind turbines, by necessity, are highly visible and that it is unrealistic to seek to conceal them.
- 128 It states that visual effects will be dependent on the distance over which a wind farm may be viewed, whether the wind turbines can be viewed adjacent to other features, different weather conditions, the character of the development and the landscape and nature of the visibility. It provides a general guide to the effect which distance has on the perception of wind turbines in an open landscape.

<b>Distance of Viewer</b>	<b>Perception</b>
Up to 2 km	Likely to be a prominent feature
2 - 5 km	Relatively prominent
5 - 15 km	Only prominent in clear visibility - seen as part of the wider landscape
15 - 30 km	Only seen in very clear visibility - a minor element in the landscape

### **4.3.4 Conclusion**

- 129 The iterative approach to design of the Whitton Wind Farm has minimised the extent of potentially significant landscape and visual effects. The layout and choice of turbine specification has been tailored to the topography and

geographic containment of the site to achieve a development which is appropriate in terms of siting, scale and layout and respects the character of the surrounding landscape.

- 130 Other material considerations in the form of Scottish Government planning policy statements establish that the planning process must look beyond the mere existence of significant landscape and visual effects. These are unavoidable with this nature of development and it must be acknowledged that change in the landscape need not be perceived as harmful. Whether wind turbines are acceptable or not is in the 'eye of the beholder'.
- 131 The true planning test is to demonstrate that through responsible site selection and appropriate site design, the scope for significant effects has been minimised. It is considered that minimisation of significant effects has been demonstrated in the ES and that the proposal is in broad conformity with the landscape protection policies of the Development Plan and should therefore be considered acceptable.

#### **4.4 Nature Conservation**

##### **4.4.1 Development Plan**

- 132 Scottish Borders Development Plan Policies relating to the potential development at Whitton have been listed below. Relevant policies can also be found within Chapter 2 Planning Framework (Volume 2).

##### **4.4.1.1 Structure Plan**

- 133 Structure Plan policies:
- N1 Local Biodiversity Action Plan
  - N2 International Sites
  - N3 National Sites
  - N4 Precautionary Principle
  - N5 Local Biodiversity Action Plan
  - N6 Environmental Impact
  - N7 Protection of Nature Conservation Interest
  - N8 River Tweed System.

##### **4.4.1.2 Local Plan**

- 134 Local Plan Policies:
- NE1 International Nature Conservation Sites
  - NE2 National Nature Conservation Sites
  - NE3 Local Biodiversity
  - NE4 Trees, Woodland and Hedgerows
  - NE5 Development Affecting the Water Environment

#### **4.4.2 Assessment of Compatibility**

##### **4.4.2.1 Ornithology**

- 135 Chapter 10 (Volume 2) provides an assessment of the likely effects of the wind farm on important bird populations during the construction, operation and decommissioning stages.
- 136 It is concluded that, provided best practice is followed to avoid disturbance to breeding birds (including the use of exclusion zones to avoid damage or destruction to occupied nests), there will be no significant impacts on any valued ornithological receptor.
- 137 Possible impacts on greylag and pink-footed geese are also considered to be not significant unless use of the Whitton Loch roost site increases to levels observed during the Autumn staging period in 2004 and 2005. This would be monitored and mitigation put in place if necessary, which would maintain the impacts as not significant when these mitigation measures are considered.

##### **4.4.2.2 Ecology**

- 138 Chapter 11 (Volume 2) provides a full Ecological Impact Assessment (EclA) of the potential impact of the proposal on the habitats and species of the Whitton area. The EclA considered the potential impacts of Whitton Wind Farm on ecological receptors during the construction, operation and decommissioning stages of the development. Most of the application area is occupied by agricultural grassland and none of the habitats are considered to be of any more than local value.
- 139 Surveys for protected species found that badgers and bats are present on the site. The residual impacts on badgers and bats are considered not significant as long as mitigation measures are adopted.
- 140 Although the site supports only a small number of otters, perhaps only one, these are thought to be part of the Special Area of Conservation (SAC) population and are therefore of international value. The potential for impacts on otters and the other qualifying features of the River Tweed SAC has been given particular consideration and concluded that, as long as standard pollution prevention techniques are adopted, the impacts on the SAC would be not significant.

#### **4.4.3 Other Material Considerations**

##### **4.4.3.1 Supplementary Planning Guidance**

- 141 Further guidance on biodiversity is given in the Scottish Borders Supplementary Planning Guidance for Biodiversity (November 2008). This document sets out Scottish Borders Council's aspirations to safeguard important habitats and species.

#### 4.4.3.2 NPPG14

- 142 NPPG14: Natural Heritage and PAN60: Planning for Natural Heritage are relevant to the proposal.
- 143 NPPG14 states that planning authorities should have full regard to natural heritage considerations in determining individual applications and advises that authorities should always consider whether environmental concerns could be adequately addressed by modifying the development proposal or attaching appropriate planning conditions.
- 144 PAN60 provides a development control checklist (paragraph 78) as a means of ensuring that decision-making in relation to natural heritage is approached in a structured and consistent way.

#### 4.4.4 **Conclusion**

- 145 The implementation of an Environmental Management Plan (Chapter 20 (Volume 2)) would ensure that high operational and environmental standards would be maintained during the working life of the project and appropriate site restoration would be carried out when operations cease.
- 146 The implementation of a Habitat Management Plan would ensure that the ecological value of the site would be restored and enhanced.
- 147 Both plans would be designed in full consultation and co-operation with SNH and SBC and both are described in outline within Appendix 11F (Volume 5).
- 148 In conclusion, the potential impact of the proposal has been considered in detail in relation to the nature conservation policies of the Development Plan and the good practice guidance of other statutory and non-statutory nature conservation bodies. On this basis the applicant finds that the proposal is in broad compliance with the policies of the Development Plan and should therefore be considered acceptable.

### 4.5 **Archaeology and Cultural Heritage**

#### 4.5.1 **Development Plan**

##### 4.5.1.1 Structure Plan

- 149 Structure Plan Policy N14 aims to protect the appearance, fabric and setting of Scheduled Ancient Monuments or other nationally important sites.
- 150 Policy N15 is concerned with protecting archaeological sites of regional or local significance.
- 151 Policy N16 aims to protect unknown archaeological remains where there is reasonable evidence of the existence.
- 152 Policy N17 aims to protect the character of Listed Buildings and their settings.

#### **4.5.1.2 Local Plan**

- 153 Policy BE1 aims to protect the character, integrity and setting of Listed Buildings.
- 154 Policy BE2 of the Local Plan aims to give strong protection to Scheduled Ancient Monuments, and any other archaeological or historical sites, strong protection from any potentially damaging development. It requires developers to carry out detailed investigations to ensure compliance with Structure Plan policies N14, N15 and N16.

#### ***4.5.2 Assessment of Compatibility***

- 155 Chapter 9 (Volume 2) provides an assessment of the potential impact of the Whitton Wind Farm proposal on cultural heritage and archaeology, which includes all types of historic buildings and archaeological sites.
- 156 The key objectives of the assessment are to:
- identify and evaluate cultural heritage features that may be affected by the wind farm
  - assess the direct and indirect impacts of the construction, operation and decommissioning of the proposed wind farm on these sites
  - propose appropriate measures to mitigate these impacts and evaluate the significance of any residual impacts
- 157 The assessment is based on information collected from Historic Scotland, the National Monuments Record for Scotland (NMRS), The Scottish Borders Council's Sites and Monuments Record (SMR) and various historic and modern map sources, supplemented by a field survey of the study area.

#### ***4.5.3 Other Material Considerations***

##### **4.5.3.1 SPP23 and PAN42**

- 158 SPP23: Planning and the Historic Environment and the associated PAN42 are relevant, as is the Memorandum of Guidance on Listed Buildings and Conservation Areas produced by Historic Scotland.

#### ***4.5.4 Conclusion***

- 159 It is concluded that, following the implementation of a programme of archaeological works, there would be no significant effects.
- 160 Residual effects would be of minor or lesser significance. The proposal is therefore considered to be in compliance with the Development Plan in respect of archaeology and cultural heritage policies.

## **4.6 Access and Recreation**

### **4.6.1 Development Plan**

#### **4.6.1.1 Structure Plan**

161 There are no access and recreation policies relevant to the proposed development in the Structure Plan.

#### **4.6.1.2 Local Plan**

162 Policy Inf2 of the Local Plan is relevant to the proposal. It aims to protect all existing access routes in accordance with the Land Reform (Scotland) Act 2003 and the Countryside (Scotland) Act 1967.

### **4.6.2 Assessment of Compatibility**

163 Chapter 15 (Volume 2) presents an audit of recreational activities and facilities within the study area and makes an assessment of the potential impact of the proposal upon these.

164 It concludes that there is a large variety of different activities that tourists and visitors can undertake within the study area. However there are few facilities and/or activities located within close proximity of the proposed wind farm site, with 92 % of activities or facilities having no effect from the proposed wind farm, and 8 % having a potential impact. Overall, these findings demonstrate that the potential effects upon tourism and recreational resources would be limited.

165 Chapter 15 also presents a review of research into the impacts and effects of wind farms on tourism and recreational users to provide a comparative assessment of impact from previous experience. This is drawn from a wide range of research sources across the UK, but mostly from Scottish experience, and also from both the 'ex ante' (before the event) appraisals of potential impact and 'ex post' (after the event) actual resulting impact. The research broadly covers the previous six year period (2002-2008).

166 The report found no comparative evidence that significant numbers of hill-walkers (or indeed any other type of visitor) would be significantly affected by the wind farm, and as a result alter their patterns of walking and recreational activity. None of the research demonstrates significant levels of impact are likely to occur.

### **4.6.3 Conclusion**

167 The report concluded that the overall impact upon visitors and the users of tourism and recreational resources would not be significant. Whitton Wind Farm proposal is found therefore to be in accordance with the Development Plan and there are no other material considerations relevant to this issue.

## **4.7 Economic Development**

### **4.7.1 *The Development Plan***

#### **4.7.1.1 Structure Plan**

168 Policy E16 aims to support the rural economy. Diversifying the economic base of the rural economy is becoming increasingly important as traditional rural industries decline.

169 Policy E22 is designed to protect the Scottish Borders tourist industry which is dependent on the quality of the environment.

#### **4.7.1.2 Local Plan**

170 There are no economic development policies in the Local Plan which are relevant to the proposal.

### **4.7.2 *Assessment of Compatibility***

171 Chapter 15 (Volume 2) presents an assessment of the socioeconomic and tourism effects of the proposal. This includes an assessment of the potential effects upon the local tourism economy, places of tourist interest and business interests. Furthermore, it also considers the potential effects on the local economy in terms of income and job creation along with the economic effects of the proposed Community Benefit Fund linked to the proposed development.

### **4.7.3 *Other Material Considerations***

#### **4.7.3.1 SPP2 Economic Development**

172 Scottish industry aims to compete on the global stage by focussing on high technology skills, research and development within the manufacturing industry. New inward investment is expected to be concentrated in higher value, highly skilled projects that are likely to be smaller in scale than previously.

#### **4.7.3.2 SPP15 Rural Development**

173 While recognising and valuing the enormous diversity of rural Scotland, SPP15 encourages rural communities to adopt a more welcoming attitude towards 'appropriate' development. The key theme is that the planning system can support this new approach.

174 It encourages local planning authorities to embrace diversification. In less populated areas there should be greater scope for more innovative planning policies. Scottish Ministers see renewable energy as a beneficiary of diversification.

#### 4.7.3.3 SPP6 Renewable Energy

- 175 The Scottish Ministers believe that a 'thriving' renewables industry has the potential to enhance Scotland's manufacturing capacity and export opportunities. Ministers expect local planning authorities to take full account of the wider benefits of renewables proposals.
- 176 SPP6 places a much greater emphasis on these matters than previous guidance. It states that *'The scope for developments to contribute to national or local economic development priorities should be a material consideration when considering policies and decisions.'*

#### **4.7.4 Conclusion**

- 177 The ES concludes that the overall impact upon visitors and the users of tourism and recreational resources would not be significant, which concurs with the conclusions of recent research on the economic impact of wind farms on tourism in Scotland. Furthermore, the research found that the proposed development would generate positive benefits for the local economy through the injection of construction capital, creation of employment during construction and the Community Benefit Fund.
- 178 The proposal supports Structure Plan Policy E16 and does not contravene Policy E22. It is therefore considered to be in line with the Development Plan and is fully supported by SPP6.

### **4.8 Hydrology, Private Water Supplies and Fisheries**

#### **4.8.1 Development Plan**

##### 4.8.1.1 Structure Plan

- 179 Structure Plan Policy I13 aims to ensure that water quality is protected from the adverse effects of development.
- 180 Policy I14 seeks to control pollution associated with surface water discharge.
- 181 Policy N8 seeks to protect *inter alia* the fisheries interests of the River Tweed.

##### 4.8.1.2 Local Plan

- 182 Local Plan Policy NE5 aims to protect the quality of the water resource and requires developers to consider how their proposals might generate potentially adverse impacts and to build in measures to minimise any such impacts and restore and enhance the water environment.
- 183 Policy NE6 is concerned with river engineering works, either 'in-stream' or 'on-bank', that would have a significant adverse effect upon water quality, quantity or flow rate, ecological status, riparian habitat, protected species or floodplains.

## **4.8.2 Assessment of Compatibility**

### **4.8.2.1 The Hydrological Regime**

- 184 Chapter 13 (Volume 2) considers the potential effect of the Whitton Wind Farm on soil and water, and describes the mitigation measures proposed to reduce potential impacts.
- 185 An assessment was made of the likely impacts of the proposed development on the soil and water environments during the site preparation, construction, operation and decommissioning phases of the wind farm.
- 186 The potential effects on the surface waters, groundwater, soils and private water supplies that have been considered are:
- pollution incident
  - erosion and sedimentation
  - changes to water resources ie private water supplies
  - modification of surface water and groundwater flows
  - modification of natural drainage patterns
  - impediments to flows and flood risk
  - compaction of soils
- 187 A number of layout, design proposals and site management measures have been identified that will minimise, mitigate or offset these effects. The latter have been incorporated into a draft Environmental Management Plan (EMP) for the site (presented in Chapter 20 (Volume 2)).
- 188 It is concluded that with the proposed mitigation in place, the residual impacts on the soil and water environment will not be significant.

### **4.8.2.2 Private Water Supplies**

- 189 In addition to the protection of natural water sources there is as an obligation to protect private water supplies. The EIA identified five private water supplies (PWS) within hydrological catchments which are in-part overlaid by the site boundary. These are well separated in physical distance and hydrological connectivity from the components of the proposed wind farm such as site roads, wind turbine foundations and the control building
- 190 The ES demonstrates that effects from the construction and operation of the proposal can be mitigated to an acceptable standard and that the proposal therefore accords with the Development Plan.

### **4.8.2.3 Fish Populations and Fisheries**

- 191 Chapter 14 (Volume 2) presents an Ecological Impact Assessment (EclA) of the fisheries and aquatic invertebrate interests related to the proposed development. The River Tweed catchment is, in part, of nature conservation interest for its aquatic features, including the river habitat, rare and protected fish species and assemblages of invertebrates.

- 192 Through consultation, desk-based study and aquatic macroinvertebrate survey, the baseline conditions of the aquatic habitats and species present within the study area have been determined. The watercourses, fish populations and macroinvertebrate communities are recorded as being of low to medium nature conservation value, with the watercourses further downstream comprising of more valuable habitats and species with greater nature conservation value (eg the high nature conservation value of the River Tweed system, including Kale Water which is approximately 500 m downstream of the northern site boundary).
- 193 An ecological impact assessment has been undertaken on the potential impacts previously identified during the formal scoping exercise. No additional issues were identified during the consultation exercise. With the exception of potential risk from pollution, no significant adverse impacts have been identified prior to mitigation measures being put in place.
- 194 Pollution resulting from construction, operation or decommissioning may significantly impact upon the Kale Water, River Teviot and River Tweed and appropriate mitigation is therefore required to negate this impact. This is especially important given the SSSI/SAC status of the watercourses downstream.
- 195 The mitigation includes the production of Method Statements that identify the construction techniques and the programme of works that would be implemented on site. Specific temporary pollution control measures and permanent drainage systems would also be installed as part of the development, all of which would be agreed in advance with SEPA. Appropriate water licences would have to be applied for and obtained in advance of any works, to meet with the requirements of the Water Environment (Controlled Activities) (Scotland) Regulations 2006.
- 196 With the application of the identified mitigation and best practice, there would be no significant residual impacts in terms of fish populations and aquatic invertebrate communities.

#### **4.8.3 Other Material Considerations**

##### **4.8.3.1 NPPG 14 Natural Heritage**

- 197 NPPG14 requires planning authorities to safeguard the natural heritage value of lochs, ponds, watercourses and wetlands within the context of a wider framework of water catchment management.

#### **4.8.4 Conclusion**

- 198 The ES demonstrates that effects from the construction, operation and decommissioning of the proposed wind farm can be mitigated to an acceptable standard in accordance with the Development Plan.
- 199 It is therefore considered that, with the implementation of appropriate mitigation measures, the proposal would be in accordance with the policies of the Development Plan.

## **4.9 Traffic and Transport**

### **4.9.1 Development Plan**

#### **4.9.1.1 Structure Plan**

200 There are no traffic and transport policies in the Structure Plan which are relevant to the proposal.

#### **4.9.1.2 Local Plan**

201 Local Plan Policy D4 includes assessment of traffic generation associated with the proposal and requires developers to demonstrate that they have considered options for minimising the operational impact of the development including routing and timing of construction traffic.

### **4.9.2 Assessment of Compatibility**

202 Chapter 7 (Volume 2) provides a detailed assessment of the potential traffic and transport impacts of the proposed development. A traffic impact assessment was carried out in accordance with the Institute of Environmental Assessment (IEA) 'Guidelines for the Environmental Assessment of Road Traffic'.

203 The report concludes that the main transportation impacts would be associated with the movements of commercial HGV to and from the site during the construction phase of the development. The maximum traffic impact associated with the construction of the wind farm is predicted to occur in the third month of the construction programme.

204 The route evaluation has concluded that the effects of the increase in traffic along the D144/4 would be acceptable considering the temporary nature of the works, the low number of receptors and the low level of traffic.

205 It is considered that the impact on the operation of nearby highways would be low.

206 To ensure the impacts remain low through the construction phase, a Traffic Management Plan would be produced in compliance with SEPA and industry best practice and would form part of the Environmental Management Plan discussed in Chapter 20 (Volume 2).

### **4.9.3 Other Material Considerations**

#### **4.9.3.1 SPP17 Planning for Transport**

207 SPP17 Planning for Transport requires development likely to affect strategic roads should be managed so as not to adversely impact on safe and efficient flow.

#### **4.9.4 Conclusion**

- 208 The ES demonstrates that the proposal accords with the Development Plan policy in this respect.

#### **4.10 Other Effects**

##### **4.10.1 Development Plan**

###### **4.10.1.1 Structure Plan**

- 209 Structure Plan Policy I20 ensures that proposals for wind energy developments are assessed for potential effects in terms of noise impact on residential and other noise-sensitive developments and land uses and 'shadow flicker' or 'driver distraction'.

###### **4.10.1.2 Local Plan**

- 210 Local Plan Policy D4 provides a comprehensive set of criteria against which wind farm proposals will be assessed. This includes effects such as noise, shadow flicker and interference with radio communications.

##### **4.10.2 Assessment of Compatibility**

###### **4.10.2.1 Noise**

- 211 Chapter 16 (Volume 2) presents an assessment the potential noise impact from the proposed development associated with construction activities and operation of the wind farm. The assessment has been carried out in accordance with ETSU-R-97 recommendations.
- 212 The assessment concludes that predicted noise levels at residential locations near the site meet the ETSU night time limit under and the lower daytime limit under all conditions. Furthermore, the assessment finds that there are no other noise sensitive activities or uses of land that would be significantly affected by the proposal.
- 213 A warranty will be sought from the manufacturers of the wind turbine for the site so that the noise output will not require a tonal noise correction under the ETSU-R-97 scheme.

###### **4.10.2.2 Shadow Flicker**

- 214 Chapter 17 (Volume 2) addresses the issue of shadow flicker which can occur when the sun is viewed through rotating blades. The potential for shadow flicker was assessed using software called 'WindFarm' which is designed specifically for this purpose.
- 215 The assessment concludes that there would be no dwellings at which shadow flicker caused by the wind farm would be considered to be a significant effect.

#### **4.10.2.3 Public Safety**

- 216 Chapter 19 (Volume 2) provides information about on the developer's health and safety policies and describes how potential safety issues regarding the construction, operation and decommissioning of the Whitton wind farm will be managed.
- 217 At no time during the construction or operation of the wind turbines would public safety be compromised. During the construction, operation and decommissioning of the wind farm, all the relevant statutory requirements would be adhered to. Public access to potentially hazardous areas would be restricted.
- 218 A Traffic Management Plan would cover all aspects of safety for pedestrians and other road users, stipulating the safety measures to be put in place to deal with the movement of construction vehicles both on-site and through local areas.
- 219 The wind turbine industry has a good safety record. The industry has prepared health and safety guidelines in conjunction with the Health and Safety Executive, Health & Safety in the Wind Energy Industry Guidelines (British Wind Energy Association 2005, Amended 2008) and the developer would implement these guidelines and other best practice on the site.

#### ***4.10.3 Other Material Considerations***

##### **4.10.3.1 PAN51 Planning, Environmental Protection and Regulation**

- 220 PAN51 states that other effects such as noise and flicker may be material considerations to a development proposal. However it clarifies that this does not mean that all planning applications likely to result in such effects should be refused but it may mean that conditions have to be applied to mitigate any adverse effects.

##### **4.10.3.2 PAN56 Planning and Noise**

- 221 PAN56 provides advice on considering noise in development control and provides specific advice on noise from wind farms. It outlines ways of mitigating the adverse impact of noise and provides guidance on the use of planning conditions relating to noise.

#### ***4.10.4 Conclusion***

- 222 The studies undertaken and reported within the ES on the potential for other effects as described above resulting from the construction, operation or decommissioning of the proposed wind farm conclude that the development will not give rise to significant environmental effects.
- 223 The proposal is therefore considered to be in accordance with the policies of the Development Plan aimed at protecting general and residential amenity.

## **4.11 Aviation and Telecommunications**

### ***4.11.1 Development Plan***

#### ***4.11.1.1 Structure Plan***

224 Structure Plan Policy I20 ensures that proposals for wind energy developments are assessed for potential interference with aircraft activity.

#### ***4.11.1.2 Local Plan***

225 Local Plan Policy D4 provides a comprehensive set of criteria against which wind farm proposals will be assessed. This includes assessment of the potential for interference with radio telecommunications and aviation.

### ***4.11.2 Assessment of Compatibility***

226 Chapter 18 (Volume 2) considers the potential implications of the Whitton Wind Farm in relation to civil aviation, Ministry of Defence activities and the potential for electromagnetic interference.

#### ***4.11.2.1 Conclusion***

227 No detrimental effects on communications links or infrastructure services are anticipated as a result of the Whitton Wind Farm proposal. The proposal is therefore found to be in accordance with the Development Plan in this respect.

## 5 BALANCING CONSIDERATIONS

### 5.1 Wider benefits of the proposal

228 SPP 6: Renewable Energy requires decision makers to take account of the environmental, social and economic benefits that will arise from a renewable energy project, both locally and nationally.

#### 5.1.1 *Social Benefits*

229 Climate change threatens long-term health, our quality of life as a society and the protection of our land and property. The social benefits that should be taken into consideration in determining the proposal include:

##### 5.1.1.1 Safety and Security of Energy Supply

230 Issues of national security are now a factor in the planning of future power generating installations. As from 2006 we have become a net importer of gas for the first time in our history. Any interruption in supply could expose the UK to power shortages and serious implications for basic services, public buildings, workplaces and homes.

231 The issue of over-dependence can be addressed by diversification of our energy base and expansion of the renewables sector. Wind energy is a technology that can be exploited today. Many forms of renewable energy are still at their concept stage but wind energy is an economically viable and proven technology.

232 Wind power also offers a safe and clean means of energy generation which does not give concern about the potential for terrorist attack and does not incur costly clean up after decommissioning.

##### 5.1.1.2 Access to Affordable Energy - Tackling 'Fuel Poverty'

233 Everyone should have the right to access affordable energy from which to derive heat and light. Restrictions would have most impact on the most vulnerable groups in society such as the elderly and low income families.

234 It is our duty as a modern and advanced society to recognise this right and manage our energy supply to counter the threat of 'fuel poverty'. Diversification of our energy base through the promotion of renewable energy would help secure supplies and ensure affordability.

##### 5.1.1.3 Human Health

235 Public health depends on sufficient food, water, shelter, good social conditions and a suitable environment for controlling infectious diseases; all factors threatened by climate change.

236 Thirty thousand people died across Europe at the start of this decade due to an unpredicted heat wave. Any increase in the frequency or intensity of extreme weather events would pose similar threats, as seen with the severe

flooding in England in 2007. Renewable energy can contribute in stabilising climate change.

#### 5.1.1.4 Infrastructure, Industry, and Settlements

- 237 Climate change will affect human settlements. Infrastructure will become more vulnerable to flooding, fire, landslides and extreme weather events.
- 238 All of these events have occurred across Europe with increasing frequency and intensity since 2000, most notably the heat wave across Europe in 2003, the forest fires in Portugal in 2005 and the recent flooding events in the UK. The results are loss of power, clean water and for some, their homes. Climate change is a contributory factor and renewable energy can help in its stabilisation.

### **5.1.2 Environmental Benefits**

#### 5.1.2.1 Reduced Emissions

- 239 Energy from the wind is free of combustion, carbon and greenhouse gases. Other forms of renewables (biomass, waste/landfill gas fuelled power stations) rely on combustion to generate power undermining their ability to cut carbon. Wind energy displaces the need for energy produced from fossil fuels. All things considered, of all the renewable energy technologies available to us today, wind has the greatest potential to reduce emissions.
- 240 Table 5.1 below shows the estimated savings in CO<sub>2</sub> emissions of the wind farm when compared with the generation of the equivalent amount of energy from fossil fuel, depending on the total capacity of the wind turbines installed.

<b>TABLE 5.1</b>	
<b>Estimated Carbon Dioxide Saving from the Possible Electrical Output of the Proposed Wind Farm Compared with Fossil Fuel Powered Generation</b>	
<b>Carbon Dioxide Saving (tCO<sub>2</sub> yr<sup>-1</sup>)</b>	
<b>12 MW capacity</b>	<b>18 MW capacity</b>
13,560	20,341

#### 5.1.2.2 Green Power for Households

- 241 The annual output of renewable energy from the proposed Whitton Wind Farm is estimated to range between 31,536 MWh yr<sup>-1</sup> based on a minimum capacity of 2 MW per wind turbine (12 MW total) and 47,304 MWh yr<sup>-1</sup> based on a maximum capacity of 3 MW per wind turbine (18 MW total).
- 242 The energy produced by the proposed wind farm is estimated to meet the domestic requirements of between 6,710 and 10,065 households.
- 243 The number of households provided for by the proposed wind farm assumes the average electricity consumption per household per annum is 4,700 kWh and the average household is 2.4 people (<http://www.bwea.com/edu/calcs.html>).

#### 5.1.2.3 Non-Polluting Construction: The Energy Payback Equation

- 244 While energy is required to produce, install, maintain and decommission wind turbines, this is rapidly recovered once they are operational. A detailed life cycle analysis by the Danish Wind Turbine Manufacturer's Association calculated that a typical wind farm repays its 'energy debt' within three to five months of operation. Larger wind turbines have a shorter payback period.

#### 5.1.2.4 Non-Polluting Operation: The Benign Nature of Wind Turbines

- 245 The only significant 'off-site' effect of wind turbines is visual. In all other respects their effect is benign. Their operation requires very little maintenance and they generate no significant fumes, noise or shadow flicker provided the developer has been responsible in site selection and sensitive in site design.

#### 5.1.2.5 Non-Polluting Decommissioning: unique energy generation

- 246 Decommissioning is simply a matter of dismantling the wind turbines and reinstating the land cover. Site roads would not be removed but the remainder of the site would be reinstated to its former condition. There is a stark contrast between this and the decommissioning of a conventional coal fired power plant, a process requiring major works over many years. The decommissioning of a nuclear power station can take hundreds of years.

#### 5.1.2.6 Environmental Protection

- 247 Protecting our environment from climate change is the greatest challenge we face as a nation.
- 248 The composition and distribution of plant and animal life will change as individual species respond to new conditions created by climate change. Habitats may degrade and fragment, and species that cannot adapt quickly enough may become extinct.
- 249 Only with a long-term concerted effort across many fronts (energy efficiency, reducing demand for energy, and increasing use of renewables) can we and the environment we inhabit, safely and securely adapt to climate change.

#### 5.1.2.7 Prudent Use of Natural Resources

- 250 The Planning Framework encourages the prudent use of resources as one of its sustainable themes. Power generated by locally sourced renewables directly replaces the need to burn fossil fuels in often remote power stations.

### **5.1.3 Economic Benefits**

#### 5.1.3.1 Job Creation

- 251 The economic benefit of the developing wind industry in Scotland is clearly illustrated by the recent investment by Welcon Towers in the former Vestas

manufacturing facility at Campbeltown. The new facility is expected to support a permanent workforce of 300 at Campbeltown and another 150 indirectly through the supply chain in the local economy.

- 252 Vattenfall intend to implement a Local Procurement Policy for the Whitton development. This aims to retain as much of the capital contract and expenditure within the Scottish Borders economy and community as possible. If this is not possible then this obligation extends to the rest of Scotland. Only once domestic markets have been exhausted would the search extend to include the UK and beyond.

#### 5.1.3.2 Economic Impact on Tourism

- 253 In March 2008 the Scottish Government published a report on the Economic Impact of Wind Farms on Scottish Tourism. The research sought to replace myths about the impact of wind farms on tourism with reliable evidence. Among other aims, it set out to establish if meeting targets on renewables would significantly impact on the possibility of meeting tourism targets. The overall conclusion of the report was that *'the effects are so small that, provided planning and marketing are carried out effectively, there is no reason why the two are incompatible.'*

#### 5.1.3.3 Marketing and Educational Opportunities

- 254 Marketing of the local area as forward-looking and 'green' has the potential to attract inward investment from related technologies or those firms attracted by a new image of the area.
- 255 The new development would provide an enhanced education resource for local schools, colleges and interest groups studying the technology. Education is key to the understanding of issues surrounding climate change, greenhouse gas emissions and the future for energy generation.

## **5.2 Recent Appeal Determinations**

- 256 In addition to the raft of national planning advice and policy, those statements handed down by Scottish Ministers and Inquiry Reporters in the form of 'planning case law' also need to be considered. Appeal determinations represent the freshest thinking on the approach to be taken by local planning authorities when considering the effect of a proposal. What follows are the key themes emerging from the recent public inquiry decisions on Green Knowes and Drumderg in Perth and Kinross and on Longpark and Toddleburn in the Scottish Borders.

#### 5.2.1.1 Dominance of the Development Plan

- 257 The Green Knowes determination established that non-compliance with the policies and guidelines of the Supplementary Planning Guidance for Wind Energy Proposals would not be sufficient, in itself, to outweigh a finding that a proposal was in compliance with the terms of the Development Plan.

### 5.2.1.2 Scottish Ministers National Guidance

258 Significant weight has been given to NPPG6 and PAN45; a trend likely to continue with the new SPP6 on Renewable Energy. The advice within PAN45 regarding the need for Scotland to accept wind farms as a feature of the landscape for the foreseeable future is accepted by Reporters.

### 5.2.1.3 Site Selection

259 Reporters confirm that the 2020 target will be met by many contributions from many projects, however small. This need for multiple sites across Scotland obviates the need to prove that sites brought forward are 'the best' available.

### 5.2.1.4 Visual Impact

260 The Green Knowes determination concluded it would not be reasonable to preclude the siting of a wind farm in an otherwise suitable location simply because it could be seen from a sensitive viewpoint, no matter how far away. (In this context the term sensitive viewpoint relates to settlements and areas designated for their landscape and visual value.)

### 5.2.1.5 Targets

261 Renewable energy, and its associated benefit of reducing emissions, makes a useful contribution to meeting both the Scottish and UK targets. The fact that current consented schemes could ensure the 2010 target for Scotland is met (if all are built) has not dissuaded Reporters from taking the approach (now endorsed in SPP6) to move on towards the next target figures for 2020 which Ministers expect to be met well ahead of schedule. It is well known that in the UK as a whole, the targets are unlikely to be met for 2010.

### 5.2.1.6 Tourism

262 There has been a failure on the part of objecting parties to produce clear evidence of any conflict with individual tourist activities or tourism in general. Reporters are yet to be convinced that wind farms have any lasting impact on tourism. If objections are to carry weight they must go beyond mere assertion or invective and be evidence based.

### 5.2.1.7 Landscape Impact

263 Wind energy development requires the use of sites in open, exposed and usually rural locations that are normally subject to general restraint on development. Landscape and visual effect has to be accepted as inevitable and, whether viewed as positive or negative, is in the eye of the beholder.

## 6 CONCLUSION

264 This Planning Statement has tested the proposal and its effects against the relevant policies of the Development Plan and where necessary discussed the influence of other material considerations prior to determining the overall acceptability of the proposal.

265 The key issues of this proposal were found to be:

- **Zero Emissions:** the potential to save 406,820 tonnes of carbon dioxide over 20 years
- **Clean Electricity:** the potential to power over 10,000 homes per year
- **Containment of the Landscape and Visual Effects:** significant impacts localised to within 5 km of the site
- **Minimised Ecological and Ornithological Effects:** with mitigation, no significant impacts predicted

266 Steps to minimise the potential for adverse effects have been embedded within the scheme from the start. The design process has been iterative and open minded so that necessary change could be accommodated. The end result is a site design that makes the optimal use of local topography to screen views and a turbine layout that represents the 'environmental best fit' for the site.

267 Positive effects on the local economy and wider environmental and social considerations relating to climate change would be experienced as a result of the development.

268 Adverse effects have been identified in relation to the landscape and visual effect of the proposal but this is inevitable with a proposal of this scale, nature and design. However, the wind turbine type, specification and number have been deliberately chosen to ensure effects are contained and localised. On balance, taking account of the landscape and visual setting of the wider area the overall landscape and visual amenity would not be affected and the wind farm would not dominate views.

269 No significant effects have been identified in respect of Sustainable Development, Nature Conservation, Archaeology and Cultural Heritage, Hydrology, Private Water Supplies and Fisheries, Traffic and Transport, Nuisance, Aviation and Telecommunications.

270 Any adverse effects from the wind farm must be weighed against the beneficial effects that would accrue from the development, including:

- **Renewable energy and climate change:** the significant contribution that the proposed development makes toward national policy on tackling the effects of Climate Change by producing energy from a renewable and sustainable means
- **Community benefits:** the potential for the wind farm to bring community benefits including the potential for local businesses to get involved with the wind farm development

- **Farm diversification:** the proposal would guarantee an income for the landowning farmers during the 20 year operational life of the wind farm, allowing scope for further diversification.

271 This Planning Statement finds the proposal to be in broad compliance with the Scottish Borders Development Plan. Furthermore, this proposal makes a significant contribution to the achievement of the Scottish Government's national policy target of sourcing 50 % of Scotland's energy demand from renewable sources by 2020.

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