



Scottish Natural Heritage Dualchas Nàdair na h-Alba

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Ms J Squires
East Lothian Council
Environment Department
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Our ref: A935187 / CPP123329

Dear Ms Squires

GUIDANCE FOR WINDFARMS OVER 12 MW

Thank you for consulting us on the above supplementary guidance. I note that we have responded separately to the Strategic Environmental Assessment which supports this strategy. We welcome the opportunity to comment on the Guidance for Windfarms over 12 MW (GWOTM) and would like to offer support to East Lothian Council to further develop this strategy prior to its adoption.

We support some of the conclusions in GWOTM and we broadly agree that the landscape capacity limits for large wind farms in and around East Lothian are close to being reached in relation to their likely cumulative impacts. We also support the basic premise of the guidance applying to wind farms of over 12 MW (not 20 MW as per current Scottish Planning Policy) and agree that this reinforces existing local guidance.

We generally agree that there is little or no scope for large wind farms in the lowland and upland fringe areas of East Lothian without significant and potentially unacceptable impacts on landscape character and visual amenity. We also agree that further development of large wind farms in the Lammermuir hills could be detrimental if it further affects the proportion of wind turbine development on the important skyline or profile of the hills, as experienced from the more populated areas of East Lothian.

However, within this context we consider there *may* be some remaining capacity for carefully designed wind farms, or more likely wind farm extensions, particularly in the immediate vicinity of existing schemes. Noting that any further developments should minimise or avoid the coalescence of existing large wind farm groupings.

Key to the successful implementation of such an approach of planned extensions would be strict control of siting and design, so that any new development appears well integrated with existing development, and relates positively to the overall pattern of development. We therefore believe that the GWOTM could consider additional search areas based upon



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good siting and design principles. We highlight the guidance in the 2009 SNH publication “Siting and Designing Windfarms in the Landscape” as being particularly relevant.

With regard to the methodology used in the first stage to identify ‘areas requiring significant protection’, we support the inclusion of the locally-important criteria – Northern Coast and Landmark Hills. However it appears that other additional criteria have been used at this stage which are more appropriate for the second stage to identify ‘areas with potential constraints’. This has led to an assessment and mapping of cumulative impacts which needs further work. As it stands the cumulative impacts map excludes almost the entire local authority area.

Scottish Planning Policy (section 189) states that the scope of cumulative impact assessment for ‘areas requiring significant protection’ should be focussed on the ‘cumulative impacts of existing and consented wind farms’. Therefore we suggest that many of the criteria used in the GWOTM cumulative impacts assessment could be moved to the second stage of assessment, specifically criteria listed in section 6.17 of GWOTM.

Section 6.19 of GWOTM brings in ‘wild land’ as a constraining factor (again in stage 1 of the assessment). However, we would advise that the SNH data, and therefore the wild land map that is used, is now out of date given the recent construction of Fallago Rig wind farm which is located centrally in an area of relative wildness.

While acknowledging the rapidly evolving picture of wind farm development in the area, we would also advise that the GWOTM should usefully be up-dated to address the recently consented development at Wester Dodd and also to more fully portray and address the wider cumulative pattern of development in areas that neighbour East Lothian. For example, in addition to Wester Dodd, we highlight the likely significant cumulative influence on East Lothian of consented development in Berwickshire at (Quixwood Moor, Hoprigshiels, and Kinegar Quarry), particularly in relation to the sequential effects that will be gained from the A1 and East Coast mainline.

In terms of combined cumulative landscape and visual impacts these above noted developments may also severely limit the potential landscape capacity for a further extension to the consented Wester Dodd development. While we note the comments in section 1.5, that there would be no further landscape capacity should Wester Dodd be consented, we also suggest that the current footprint for the search area appears larger than the footprint for the consented Wester Dodd development. We therefore reserve judgement on the merits of this search area but we would highlight the need for more detailed design guidance to accompany this area of search if it is to be taken forward in the finalised guidance and against a baseline including the Wester Dodd scheme.

In relation to the Habitats Regulations Assessment (sections 4.13 to 4.18) we suggest that some of the text would benefit from revision and we offer our assistance with this.

Finally, we are happy to work with you towards finalising the guidance or addressing any of the issues that we have raised in this letter.

Yours sincerely

[by email]

Malcolm Fraser
Operations Officer
Forth