

Issue 7	A Low Carbon Economy	
Development Plan reference:	Page 38-39 Paragraphs 4.24 – 4.29 and Figure 4.2	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Borders Network of Conservation Groups (039614) Cockburn Association (037249) Cramond and Barnton Community Council (803443) Denholm and District Community Council (040612) EDF Energy (040462) EDF Energy Renewables Ltd(039326) Edinburgh Association of Community Councils (040476) Edinburgh BioQuarter Partners (037370) Fred. Olsen Renewables Ltd (831830) Gullane Area Community Council (037068) Hargreaves Services (038881) Lammermuir Community Council (039856) Liberton and District Community Council (790396)</p>	<p>Mrs Mirabelle Maslin (928549) Midlothian Green Party (778339) Minto Hills Conservation Group (040607) Moorfoot Community Council (906008) Near na Gaoithe Offshore Wind Ltd (034699) North Berwick Community Council (035522) Northumberland County Council (790480) Renewable Energy Systems Ltd (038582) Roslin and Bilston Community Council (790524) RSPB Scotland (031480) ScottishPower Generation (034698) Scottish Government (034404) SP Energy Networks (034701) SSE Renewables Ltd (040624) Mr Charles Strang (907037)</p>	
Provision of the Development Plan to which the issue relates:	This section of the plan deals with low carbon energy including wind and heat.	
Planning Authority's summary of the representation(s):		
<p><u>Borders Network of Conservation Groups (039614)</u> 2km separation distance does not cover homes outwith settlements. 2km should be a minimum from any dwelling.</p> <p>Repowering of turbines are likely to be taller than existing turbines requiring larger separation distances and new concrete bases. Repowering will further destruct habitats, peat and water courses, will require new access tracks and visual impacts will be increased. Existing turbines are micro-sited to minimise impacts - concerned that repowered turbines may not be.</p> <p><u>Cockburn Association (037249)</u> Generally support approach, but concerned about balance of wind farms and</p>		

impact on environment and communities.

Cramond and Barnton Community Council (803443)

Focus policy more on small scale, diverse and environmentally acceptable renewable energy schemes including community wind turbines, solar, hydro and biomass.

Denholm and District Community Council (040612)

Objects to promotion of Borders for further wind development.

EDF Energy (040462)

Plan could more positively and accurately reflect national energy and policy position.

'2km separation zone' is a term not used in Scottish Planning Policy (SPP) or guidance. It should be made clear in the plan that 2km separation is not a ban on wind development but are areas for consideration of visual impact.

EDF Energy Renewables Ltd (039326)

Paragraph 4.27 is negative in saying wind developments in East Lothian and Borders have already made a significant contribution to low carbon economy, when the Scottish Government have indicated renewable energy and electricity targets for 2020 and 2030 face significant shortfalls and carbon emission savings targets for 2020, 2030 and 2050 remain challenging.

Paragraph's content on significant peatland habitats also negative and '2km separation zone' is a term not used in SPP or guidance. It should be made clear in the plan that 2km separation is not a ban on wind development but are areas for consideration of visual impact.

EDF Energy (040462), EDF Energy Renewables Ltd (039326)

Paragraph 4.28 exploring wind farm repowering is supported, however emphasis seems to be on minimising impacts on cross boundary assets in plan, not on opportunities. Repowering should be seen as an opportunity to meet challenging renewables and electricity targets and to address climate change.

Mention should be given to wind farm extensions as per SPP paragraph 161.

Edinburgh Association of Community Councils (040476)

Low carbon economy should apply to existing settlements.

Edinburgh BioQuarter Partners (037370)

Plan should recognise alternative heating sources including district heating which is being promoted at the BioQuarter along with a longer term energy from waste facility.

Fred. Olsen Renewables Ltd (831830)

Figure 4.2 Areas with Potential for Wind Farm Development it is not appropriate to caveat only this area with 'subject to landscape capacity and other assessment'. Object to caveating for landscape capacity. Landscape and Visual Impact

Assessment (LVIA) should be used to assess this on a case by case basis. It should not be predetermined by strategic guidance. 2km upper limit separation zone should also be assessed on a case by case basis. These should be clear in the plan.

Support cross boundary wind farm working group.

In the transition to a low carbon strategy the Plan should recognise new and repowering of onshore wind development will continue to have a role.

Exploring increased production from existing wind farms and exploring energy storage and complimentary sources of generation should also be included. Policy in the Strategic Development Plan and Local Development Plans should be flexible and supportive of low carbon technologies. Onshore wind development should be subject to the same assessment and consideration as other energy development and be considered on a case by case basis. Lammermuir Hills and similar are Group 3 areas in SPP and do not need to be highlighted as strategic constraints.

Gullane Area Community Council (037068)

Table 4.2. This shows shaded in grey areas which should be given significant protection from windfarm development. Figure 4.2 should include Garleton Hills in areas with significant protection from wind farm development.

Hargreaves Services (038881)

Believe implementing a 2km buffer zone around settlements will be overly and unnecessarily restrictive. Any potential impacts on settlements should be assessed as part of an Environmental Impact Assessment.

Should incorporate policy on energy storage, and any policy should be supportive of renewable energy developments that incorporate an aspect of energy storage

Lammermuir Community Council (039856)

New sites for onshore wind should be put on hold until there has been an assessment about the need for more generation nationally and in the region. Grid capacity should be assessed. Should not be an assumption that existing sites are best for repowering, some function poorly and should be decommissioned.

Areas affected by substantial adverse landscape change, including the Lammermuirs, should be protected from further development.

Liberton and District Community Council (790396)

Support proposals as set out in paragraph 4.25. Should be cross referenced to paragraph 4.23 re energy from waste facilities.

Mrs Mirabelle Maslin (928549)

How can plan ensure co locations of heat demand and supply and that all opportunities are identified.

Midlothian Green Party (778339)

There should be a region-wide low carbon plan, addressing energy, heat and

transport. 2km buffer on wind development is too restrictive.

Minto Hills Conservation Group (040607)

Paragraph 4.27 is ambiguous. Repowering will lead to larger turbines and should refer to buffer zones and acknowledgement should be made to increased environmental damage.

Moorfoot Community Council (906008)

Support cross boundary wind farm working group but consider there should be similar for other renewable energy proposals. A region wide sustainable energy plan which looks at resources and constraints in each authority and sets targets and actions should be produced.

Neart na Gaoithe Offshore Wind Ltd (034699)

Plan fails to consider a wider range of developments needed for low carbon economy. Plan fails to fully address National Planning Framework (NPF) as there is no reference to providing infrastructure for major offshore renewable energy developments and no mention of the National Development number 4 'An Enhanced High Voltage Energy Transmission Network'.

Should recognise the role of role of East Lothian as landfall for nationally significant offshore wind developments.

North Berwick Community Council (035522)

Low carbon economy means that there should be no large scale development in North Berwick as it is not sustainable. Would support moves to compel developers to adopt new technologies and alternative energy sources.

Northumberland County Council (790480)

Northumberland County Council welcomes the establishment of this working group and would wish to be involved in this group given there is potential for cross boundary effects with Northumberland. Would be beneficial to set out a policy framework for other renewable energy technologies not just wind.

Renewable Energy Systems (038582)

Paragraph 4.27 reflects paragraph 163 of SPP. Support Cross Boundary Wind Farm Working Group but consider there should be industry representation.

Should acknowledge increasing energy storage opportunities.

Roslin and Bilston Community Council (790524)

Should suggest how low carbon policy can be implemented. Low carbon economy should first be achieved by building houses close to centres of employment or locating businesses in rural areas with targeted public transport and high speed broadband access. Current plans for out of town dormitories and transport corridors will not achieve low carbon economy.

Support development located to sources of heat supply but this may not always be possible.

Plan should ask developers to include technology such as solar panels, build heat efficient homes and use the roofs of large buildings such as schools for solar panels.

RSPB Scotland (031480)

Plan needs to recognise the need for low carbon developments to be sustainable and not have a negative impact on wildlife. Impacts on Firth of Forth Special Protection Area must be considered regarding development of former Cockenzie and Longannet power stations. Support continued development of onshore wind farms where this does not harm natural environment. Would like to see cumulative ornithological impacts considered from wind developments to ensure compliance with Strategic Environmental Assessment and Appropriate Assessment requirements, as well as local authorities biodiversity duties under the Nature Conservation Scotland Act 2004 in the context of natural heritage zones. Approach used in 2050 RSPB Energy Vision (RSD07, RSD08 and RSD09).

Commend the recognition of opportunities for providing low-carbon power and heat solutions and an integrated transport network. Future development at Cockenzie should take into account the Musselburgh Lagoons and take opportunity to incorporate new habitat.

ScottishPower Generation (034698)

Proposed Plan does not make sufficient reference to National Planning Framework policy including in reference to former Longannet Power Station site. National Planning Framework National Developments at Longannet and Cockenzie, despite their status changing, must be taken account of in the Plan. Should also make reference to wider aspirations for Cockenzie in National Planning Framework and taskforce masterplan for Longannet.

Scottish Government (034404)

Strategic Development Plans should support national priorities for strategic energy infrastructure including generation, storage, transmission and distribution networks.

Plan should address cross boundary issues, promoting an approach to electricity and heat that supports the transition to a low carbon economy.

Consider that Strategic Development Plan Authorities should encourage the efficient delivery of heat in all its forms, looking for potential opportunities to link urban networks across broader metropolitan areas, including local authority boundaries. There is no apparent consideration given in the Plan (including background reports) to cross boundary heat issues and no action proposed to consider this. Should use Scotland's Heat Map.

SP Energy Networks (034701)

Does not consider wider range of developments which contribute to the delivery of a low carbon economy. Does not address National Planning Framework by failing to reference national electricity transmission network, grid connections for onshore renewables, National Development 4 (An Enhanced High Voltage Energy Transmission Network). Does not address Energy Network Strategy Group (ENSG) Our Electricity Transmission Network: A Vision For 2020 document or the National

Grid's Network Options Assessment.

Mr Charles Strang (907037)

Should reference river and 'lade-based' renewable energy generation. No area around Scottish Cheviots where wind farms are not acceptable this should be reconsidered along with impacts on Northumberland National Park.

SSE Renewables Ltd (040624)

Generally support but should recognise that the Scottish Government have indicated renewable energy and electricity targets for 2020 and 2030 and face significant shortfalls and carbon emission savings targets for 2020, 2030 and 2050 remain challenging. Recognise Scottish Borders and East Lothian can still provide opportunities for onshore wind. '2km separation zone' is a term not used in SPP or guidance it is referred to as area not exceeding 2km. The extent of the area will be determined by land form and other features which restrict views out from the settlement" (Table 1, SPP). 2km is a maximum and only refers to potential visual impact. Plan should require Local Authorities to justify maximum 2km distance.

Repowering should be seen as an opportunity to meet challenging renewables and electricity targets and to address climate change. Plan should set a positive policy framework for repowering for all constituent Planning Authorities to then progress at the Local Development Plan level.

Mention should be given to wind farm extensions as per SPP paragraph 161.

Considerable operational consented wind energy development in the region should be acknowledged as a resource with further potential and supported in policy terms.

Modifications sought by those submitting representations:

Borders Network of Conservation Groups (039614)

Add: 'Local Development Plans will apply separation zones of at least 2km from a wind farm to any dwelling. Local Development Plans should set out environmental, landscape and habitat considerations based on future re-powering with turbines of heights in excess of 150m, regardless of whether they will have cross-boundary effects.'

Cockburn Association (037249)

Paragraph 4.24: Include a statement to monitor improvements in vehicle emissions and its related opportunities for more flexible options to locate housing land.

Paragraph 4.27 add statements: "seek optimum energy capacity"; "Review the separation distance required for new, taller 'repowering' turbines"; "Where there is a conflict between the location of a windfarm and the natural heritage and community interests in the area, the provisions in the National Park (Scotland) Act 2000 9(6) should be applied."

Paragraph 4.29 add: "Local Development Plans should provide guidance for the development of windfarms: Informal turbine layouts that reflect natural landforms,

rather than formal, geometric layouts; Variation in turbine size with elevation “larger at lower elevations, smaller at higher elevations, especially on skylines; Variation in colour of turbines “local vegetation colours against a landscape background; lighter, cloud colours against a sky background; Connecting powerlines to be sited to minimize their impacts; Road and fence alignments to be sinuous and reflect landforms, rather than geometric; All structures to be designed to minimise their impacts.”

Cramond and Barnton Community Council (803443)

Focus policy more on small scale, diverse and environmentally acceptable renewable energy schemes including community wind turbines, solar, hydro and biomass.

EDF Energy Renewables Ltd (039326)

Recognise challenging renewable energy, electricity and carbon targets. Scottish Borders and East Lothian still provide opportunities for onshore wind development. Supporting text to Onshore Wind Spatial Framework should be more positive.

EDF Energy Renewables Ltd (039326), EDF Energy (040462)

Position on 2km separation zone should be clarified.

Repowering of wind farms should be seen as an opportunity. Should add text on potential for wind farm extensions. Amount of operational and consented wind energy development in the region should be considered a significant infrastructure resource and supported by the policy.

Edinburgh Association of Community Councils (040476)

Low carbon economy should apply to existing settlements.

Edinburgh BioQuarter Partners (037370)

Plan should recognise alternative heating sources including district heating and energy from waste. BioQuarter could be an exemplar.

Fred. Olsen Renewables Ltd (831830)

Add amendment as follows: 4.27 Wind farm developments in the region, particularly in the Scottish Borders and in East Lothian have already made and will continue to make a major contribution to Scotland's transition to a low carbon economy. Re-powering in particular provides a platform for maximising the generating capacity of existing sites and utilisation of grid connections. There are also significant areas of peatland habitat in the Scottish Borders important for carbon sequestration. Figure 4.2 sets out a spatial framework that identifies areas with potential for wind farm development, subject to landscape capacity and detailed considerations against relevant Local Development Plan policy criteria. Included in this framework is a 2km separation zone around settlements. Local Development Plans will apply these 2km separation zones up to a maximum of 2km from an identified settlement envelope or edge for creating spatial frameworks.

4.28 SESplan will establish a Cross-Boundary Wind Farm Working Group to explore the potential for a plan-led approach to identifying strategic capacity for

wind farms and repowering opportunities (i.e. using existing infrastructure where possible and replacing old turbines with new ones , increasing tip heights and rotor diameters of existing turbines and potentially incorporating energy storage and other complimentary sources of generation) in areas where there are likely to be cross-boundary effects. Relevant member authorities, including the Energy Consents Unit and developers / industry representatives will pursue a collaborative plan-led approach to repowering in order to develop a low carbon economy and minimise the impact on key cross-boundary assets.

4.29 Local Development Plans will also set out the full range of additional considerations they will apply to wind farm energy development proposals based on the particular characteristics of each area and in line with SPP. In doing so, they should liaise closely with neighbouring authorities to identify and establish a consistent policy approach to key strategic cross-boundary assets. These assets will include, but will not be limited to, the Pentland Hills Regional Park, the Lomond Hills Regional Park, the Lammermuir Hills and the Firth of Forth.

Gullane Area Community Council (037068)

Figure 4.2 should include Garleton Hills in areas with significant protection from wind farm development.

Hargreaves Services (038881)

Remove 2km buffer zone and replace with assessment under Environmental Impact Assessment. Add text supporting energy storage.

Lammermuir Community Council (039856)

New sites for onshore wind should be put on hold until there has been an assessment about need. Grid capacity should be assessed. Should not be an assumption that existing sites are best for repowering. Areas affected by substantial adverse landscape change, including the Lammermuirs, should be protected from further development.

Liberton and District Community Council (790396)

Support proposals as set out in paragraph 4.25. Should be cross referenced to paragraph 4.23 re energy from waste facilities.

Mrs Mirabelle Maslin (928549)

No modification specified, more specific identification of opportunities and delivery actions implied.

Midlothian Green Party (778339)

There should be a region-wide low carbon plan, addressing energy, heat and transport. 2km buffer on wind development is too restrictive.

Minto Hills Conservation Group (040607)

Reword paragraph 4.27 'Local Development Plans will apply separation zones of at least 2km from all residential buildings (regardless of whether they are in a settlement envelope / edge or standalone) or insist that the developer provides compensation to the owner/s.' Refer to buffer zones and increased environmental damage in repowering.

Moorfoot Community Council (906008)

Produce region wide sustainable energy plan. Give explicit support for community and council owned renewable energy.

Neart na Gaoithe Offshore Wind Ltd (034699)

Include clearer reference to NPF3, in particular national development 4. New paragraphs to be included in between existing paragraphs 4.26 and 4.27, as follows:

“4.27 The city region, in particular East Lothian, is key to the delivery of a number of major offshore renewables developments, including the Neart na Gaoithe Offshore Wind Farm. Planning permissions exist (and in cases such as Neart na Gaoithe have been implemented) for essential new terrestrial infrastructure including cables and substations relating to offshore renewables.

4.28 The city region accommodates a number of developments falling within the scope of NPF3’s National Development number 4, including those relating to offshore wind farms such as Neart na Gaoithe. Member authorities should recognise the need for new large scale transmission infrastructure essential to the offshore renewables industry and more generally in contributing towards the delivery of a low carbon economy. LDP policies should promote such development and safeguard approved infrastructure against potentially conflicting development which might jeopardise its delivery.

4.29 Opportunities associated with offshore renewables exist at port and harbour locations across the city region, in particular in supporting the industry through construction, operation and maintenance phases of development. Member authorities will support ports and harbours potential involvement in the offshore renewables sectors by facilitating development essential to such roles. Subsequent paragraph numbers to be updated accordingly.

New figure to be included illustrating strategically important infrastructure contributing towards the delivery of a low carbon economy, including Neart na Gaoithe’s terrestrial infrastructure.

North Berwick Community Council (035522)

No modification specified, assume no development at North Berwick and policy to ensure developers adopt new technologies.

Northumberland County Council (790480)

Set out a policy framework for other renewable energy technologies not just wind.

Renewable Energy Systems Ltd. (038582)

Support Cross Boundary Wind Farm Working Group but consider there should be industry representation. Paragraph 4.29 add: 'The Scottish Government recognises the importance of the integration of energy storage as part of the energy mix. Local Development Plans shall include provision to support the deployment of energy storage in locations throughout the region.'

Roslin and Bilston Community Council (790524)

Suggest how low carbon policy can be implemented. Start with more sustainable housing and employment strategy. Building less and more slowly. Ask developers to include technology such as solar panels, build heat efficient homes and use roofs of large buildings such as schools for solar panels.

RSPB Scotland (031480)

Figure 4.2 Onshore Wind Spatial Framework the legend should be updated to refer to further consideration of ecological risk. i.e. *Subject to landscape capacity ecological risk and other assessment. Figure 4.2 The legend should make it clear that the 2km buffer around communities is a maximum, the actual size of the buffer area should be determined by the planning authority.

4.26 SESplan should promote the use of district heating and establishment of energy centres within all major redevelopment areas, not just at Longannet and Cockerzie.

Any references to biomass plants should note that feedstocks should only be from sustainable sources.

Would like to see cumulative ornithological impacts considered from wind developments in the context of natural heritage zones.

Include policies to ensure that any implementation of thermal generation at Cockerzie (or elsewhere) is compatible with Scotland's climate targets.

ScottishPower Generation (034698)

Modify the Proposed Plan as follows: Include clearer reference to NPF3, in particular: (i) national development number 3; (ii) commentary on potential aspirations for the Cockerzie site; and (iii) the Cockerzie to Torness Area of Coordinated Action;

Add after paragraph 4.26: "Although electricity generation at Cockerzie and Longannet has recently ceased, both sites are afforded national development designation for continued baseload generation by NPF3. Those designations remain extant and Local Development Plans should facilitate development consistent with the designations and any subsequent policy relating to the sites which might emerge from any NPF review during the SESplan period. NPF3 also recognises the potential of the former Cockerzie Power Station site for renewable energy and energy-related investment, whilst in considering the potential for conflicting uses, seeks to promote development which maximises the site's economic development potential. East Lothian Council should reflect these aspirations in its Local Development Plan."

Add to paragraph 4.26, after the sentence ending Carbon Capture and Storage Network (sentence 2) "A taskforce is currently developing a masterplan for the former Longannet Power Station site, with a focus on maximising employment opportunities, during and following the long-term demolition and decommissioning process."

Scottish Government (034404)

Amend to include a statement that the outputs of cross boundary working groups for wind and strategic heat infrastructure will be adopted as supplementary guidance listing the elements that should be contained within them.

SP Energy Networks (034701)

Add after paragraph 4.26: "4.27 Significant investment in the electricity grid across the city region will be delivered during the SESplan period. The city region accommodates a number of grid reinforcement developments falling within the scope of NPF3's national development number 4, as well as upgrading and improvement works. Member authorities should recognise the need for essential electricity grid reinforcement, upgrading and improvement works that contribute towards the delivery of a low carbon economy, maintaining an ongoing dialogue with the grid operator in order to facilitate its programme of works over short-, medium- and long-terms. LDP policies should promote and facilitate such development and safeguard approved infrastructure against potentially conflicting development which might jeopardise its delivery.

Add new figure illustrating strategically important infrastructure contributing towards the delivery of a low carbon economy.

Mr Charles Strang (907037)

Should reference river and 'lade-based' renewable energy generation. No area around Scottish Cheviots where wind farms are not acceptable this should be reconsidered along with impacts on Northumberland National Park.

SSE Renewables Ltd (040624)

Recognise challenging renewable energy, electricity and carbon targets. Scottish Borders and East Lothian still provide opportunities onshore wind development. Supporting text to Onshore Wind Spatial Framework should be more positive.

Position on 2km separation zone should be clarified.

Repowering of wind farms should be seen as an opportunity. Should add text on potential for wind farm extensions. Amount of operational and consented wind energy development in the region should be considered a significant infrastructure resource and supported by the policy.

Summary of responses (including reasons) by Planning Authority:

Onshore Wind Spatial Framework

Borders Network of Conservation Groups (039614), EDF Energy Renewables Ltd (039326), EDF Energy (040462), Fred. Olsen Renewables Ltd (831830), Hargreaves Services (038881), Midlothian Green Party (778339), Minto Hills Conservation Group (040607), RSPB Scotland (031480), SSE Renewables Ltd (040624)

Paragraph 161 of SPP (ASD06) states that the development plan should set out a spatial framework identifying areas that are most likely to be appropriate for onshore wind farms. This framework is to use Table 1 (page 39) of SPP which identifies three groupings of areas to guide onshore wind farm development. These

include: Group 1 'Areas where wind farms not acceptable', Group 2 'Areas of Significant Protection' and Group 3 'Areas with potential for wind farm development. Group 2 'Areas of Significant Protection', includes provision for an area of 'community separation for consideration of visual impact'. This is described as "an area not exceeding 2km around cities towns and villages" with the extent of the area to be "determined by the planning authority based on landform and other features which restrict views out of the settlement".

In the Proposed Plan, Figure 4.2 Onshore Wind Spatial Framework implements the requirement of SPP paragraph 161 with instruction to LDPs provided in paragraph 4.27 of the Proposed Plan. In the Proposed Plan the 'area not exceeding 2km around cities towns and villages' is described as a '2km separation zone around settlements' for ease of reference. The fourth line of Proposed Plan paragraph 4.27 clarifies that this is a maximum of 2km to be applied by Local Development Plans. Figure 4.2 relays the categories listed in SPP table 1 and adds a footnote that 'Areas with potential' will be 'Subject to landscape capacity and other assessment'. This reflects the elements of further consideration as is included in SPP. **No modification proposed.**

Gullane Area Community Council (037068), Lammermuir Community Council (039856), Mr Charles Strang (907037)

SDP figure 4.2 is required to reflect the group categories, as set in table 1 page 39 of SPP (and listed above) (ASD06). The SDP cannot add additional areas to these groupings outwith those stated in SPP. **No modification proposed.**

Strategic Wind

Scottish Government (034404)

The Onshore Wind Spatial Framework (Figure 4.2) and paragraphs 4.27 to 4.29 in the Proposed Plan set out SESplan's approach to wind farm development and repowering. Figure 4.2 gives an indication, at a regional scale, of areas where there may be opportunities for new wind farm development. The Proposed Plan sets out in paragraph 4.28 how the plan's content will be further supported by a Cross-Boundary Wind Farm Working Group who will identify the strategic capacity for wind farms in the region and strategic repowering opportunities.

SESplan's Main Issues Report (ASD12) confirmed that many of the most suitable and least environmentally sensitive locations for wind farm development in the region had already been developed. Whilst SESplan recognise there may be further opportunities in the region and indeed opportunities around repowering, these are not considered to require separate strategic supplementary guidance as these opportunities will be taken forward in LDPs and through Development Management

A number of SESplan member authorities in areas where most wind farm development occurs or is likely to occur, have existing, or are in the process of updating, their own Supplementary Guidance and Landscape Capacity Studies. This includes Scottish Borders, West Lothian, Midlothian and Fife councils. There are also a number of other sources of wind development guidance such as those produced by Key Agency SNH (ASD13). SESplan consider the production of another layer of guidance to be unnecessary, adding to the complexity for

developers and communities. In addition SESplan also consider that any additional supplementary guidance should be limited in line with the 2017 consultation on the Scottish planning system (ASD10) which recommends the removal of supplementary guidance.

SESplan consider that the Proposed Plan sets appropriate strategic direction for wind development at SDP level and that this is consistent with other SDP areas, notably the recent Proposed SDPs as examined for Tayplan and Clydeplan. The addition of a SESplan Wind Farm Working Group, gives further opportunity for relevant SESplan member authorities to undertake collaborative work. SESplan do not consider it necessary for the outcome of the Wind Farm Working Group to be Supplementary Guidance as it would be unlikely to add standalone value to the development plan. **No modification proposed.**

Wind Farm Development Including Extensions and Repowering
Borders Network of Conservation Groups (039614), Cockburn Association (037249)

The Proposed Plan in paragraph 4.29 instructs Local Development Plans will “set out a full range of additional considerations they will apply to wind farm proposals.” All types of wind farm development including new, extensions and repowering can be considered under the term ‘wind farm proposals’.

The specific guidance on the siting, height, appearance, infrastructure, community and environmental impacts associated with wind development, including the repowering of wind farms, will be subject to policy in Local Development Plans, as indicated above, and assessment under the Development Management process. It is considered that detailed advice on these matters would not be appropriate in the Strategic Development Plan. **No modification proposed.**

EDF Energy (040462), EDF Energy Renewables Ltd (039326), SSE Renewables Ltd (040624)

It is considered that, whilst there could be potential in the region for wind farm extensions, these would be best considered by local authorities using the Development Management process supported by the policy of Local Development Plans as indicated above. **No modification proposed.**

Lammermuir Community Council (039856)

New wind and other renewable or low carbon energy development is a key component of national policy in SPP and the NPF and the SDP is required to reflect these policy positions. **No modification proposed.**

Strategic Heat Infrastructure

Edinburgh BioQuarter Partners (037370), Liberton and District Community Council (790396), Mrs Mirabelle Maslin (928549), Roslin and Bilston Community Council (790524), Scottish Government (034404)

Paragraph 4.25 and table 3.1 Placemaking Principles set out SESplan’s approach to strategic heat, stating the need for Local Development Plans to identify opportunities for co-locating sources of high heat demand and supply.

SESplan notes comments that the Proposed Plan could identify opportunities to

link urban networks across local authority boundaries. However, while it is accepted that opportunities for heat networks may cross local authority boundaries, solutions for realising these rely on planning at a more detailed scale than what is achievable at SDP level.

SESplan consider that preparing additional guidance or a heat map at a strategic scale would not add value to the plan beyond what is already available at a national level in the Scotland Heat Map (ASD14) and feels this role would be better performed through Local Development Plans (as stated in SPP paragraph 158 ASD06) who can analyse heat data in relation to their site specific allocations. Work has already been undertaken by SESplan member authorities including Fife Council who have produced their own interactive heat map (ASD15) and are preparing Supplementary Guidance on this matter. Midlothian Council will be producing guidance on community heating following their proposed LDP.

The direction of energy and heat infrastructure is currently subject to national consultations through the Scottish Energy Strategy (ASD16) and Local Heat & Energy (ASD17). This information may potentially succeed any guidance prepared at the strategic level. SESplan also considers that any additional supplementary guidance should be limited in line with the 2017 consultation on the Scottish planning system (ASD10) which recommends the removal of supplementary guidance.

SESplan consider that the Proposed Plan makes it clear that Local Development Plans should identify opportunities for connecting heat networks in the context of the placemaking principles in table 3.1 and paragraph 4.25. **No modification proposed.**

National Planning Framework and National Developments

EDF Energy (040462), Neart na Gaoithe Offshore Wind Ltd (034699), ScottishPower Generation (034698), SP Energy Networks (034701)

It is considered that through the Significant Business Clusters paragraphs 4.1 - 4.7 and table 4.1 and Low carbon Economy section paragraph 4.26 the plan identifies strategic sites and opportunities for the servicing and manufacture of offshore wind and other low carbon energy capture or generation opportunities reflecting and supporting, where relevant, those sites identified in the National Planning Framework as well as National Renewable Infrastructure Plan (ASD18 and ASD19) sites. SESplan do not repeat national policy, such as SPP, as there is no need to reiterate this. **No modification proposed.**

Energy Storage and Infrastructure

Hargreaves Services (038881), Renewable Energy Systems Ltd (038582), Scottish Government (034404)

The plan makes reference to energy storage in relation to the Cockenzie and Longannet sites and whilst no specific reference is made to energy storage in relation to wind use, this is a potential outcome of the Cross-Boundary Wind Farm Working Group. In addition, energy storage would, in many cases, take place where generation occurs rather than across local authority boundaries. **No modification proposed.**

Region wide energy plan

Midlothian Green Party (778339), Moorfoot Community Council (906008), Northumberland County Council (790480)

The SDP, along with national policy statements, provide a basis for the regional context in renewable energy planning. **No modification proposed.**

Smaller Scale Proposals and application to existing settlements

Cramond and Barnton Community Council (803443), Edinburgh Association of Community Councils (040476), North Berwick Community Council (035522), Roslin and Bilston Community Council (790524), Mr Charles Strang (907037)

It is noted that smaller scale, domestic proposals and improvements to existing buildings can make an impact on carbon emissions, however it is considered that these measures cannot be accurately reflected in strategic policy and would be more appropriately addressed through Local Development Plans, Development Management and other means such as Building Standards. **No modification proposed.**

Other

Denholm and District Community Council (040612)

It is recognised within the plan that the Scottish Borders have already made a significant contribution to wind developments. National policy and the Development Plan (Strategic Development Plan and Local Development Plan) provide protection to key areas from inappropriate wind development and Development Management assesses wind applications for their impact on a case by case basis. On this basis, it would not be considered appropriate to exclude an entire local authority area when measures are already in place to protect areas from inappropriate development. **No modification proposed.**

EDF Energy (040462), EDF Energy Renewables Ltd (039326), SSE Renewables Ltd (040624)

The source of the quoted figures on Scotland's performance against renewable energy and electricity targets and carbon emission are not known, however, it is considered that the Spatial Strategy and Low Carbon Economy sections of the Proposed Plan recognise the importance of a sustainable and low carbon region through reducing commuting and providing a strategic basis for renewable energy such as wind. It is not considered that the text in paragraph 4.27 is negative in stating that the region has a good track record in contributing to the low carbon economy. Peatland habitat is protected through SPP in table 1 page 38. **No modification proposed.**

Roslin and Bilston Community Council (790524)

The SDP's Spatial Strategy sets out how new development will be directed to locations which minimise the need to travel or which provide low carbon travel options. **No modification proposed.**

RSPB Scotland (031480)

Whilst the plan does not specifically reference the need to ensure development does not have negative impacts on wildlife and the environment, it is considered that this protection is delivered through other means including European and national designations, Environmental Impact Assessments and the Development

Management process. The Plan as a whole is assessed for its environmental impacts through the Environmental Report, 2016 (ASD20). **No modification proposed.**

Cockburn Association (037249)

Monitoring vehicle emissions is not a function of the SDP. **No modification proposed.**

12 representations supporting this section of the Proposed Plan are also noted.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]