



Orkney Renewable Energy Forum (OREF)
c/o Aquatera
Stromness Business Centre
Old Academy
Stromness
Orkney
KW16 3AW

F.A.O. Susan Shearer
Senior Planning Advisor
Orkney Islands Council
School Place
Kirkwall
Orkney
KW15 1NY

29 November 2012

Dear Susan,

Re: Response to Wind Energy Supplementary Planning Guidance Consultation

The Orkney Renewable Energy Forum (OREF) welcomes the revision of the Orkney Island Council's (OIC) Wind Energy Supplementary Planning Guidance as part of an ongoing review of sustainable wind energy developments throughout Orkney.

Following review of the document OREF would like to make the following comments (these relate only to the document issued for consultation):

- OREF believes that the revision of the document shows a positive response from planning in terms of ensuring that there is appropriate planning guidance in place to ensure the principles of sustainable development are implemented;
- OREF is supportive of the proposals by the OIC to undertake a Wind Energy Landscape Capacity Study and Acoustic Capacity Study for Orkney and would welcome an opportunity to engage with OIC to develop terms of reference and approach to the surveys maximising the breadth of professional experience and local knowledge across its membership;
- OREF welcome the changes to the Spatial Strategy to bring it in line with SPP and online advice but would like to highlight the issue of grid restraint issues for potential consideration in future reviews of wind guidance;
- OREF welcome the reduction of the Development clauses from 9 to 8;
- OREF would request that further definition is given in relation to the reference to '...primarily serving...' within the table on page 3 and 11. It is understood that the reason for locating small and medium sized turbines nearer to buildings is to reduce the landscape and visual impact and it does not seem acceptable for planning to require that these turbines primarily serve these properties;



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- OREF would suggest that consideration be given to using the same wording within the Guidance as is used in the SPP in relation to the visual link. The guidance says that the SPP states that it will ‘...encourage projects that are associated with existing buildings...’ however the Guidance suggests that a, ‘...a clear visual link...’ is required. Keeping the terminology the same would avoid confusion and different interpretations;
- OREF would suggest that tower height could be considered as a means of reducing visual impact depending on the location and surrounding environment however that this should not be something that planning states as a requirement e.g. ‘...must be kept to a minimum...’;
- OREF have some concern over the reference to core paths being considered as a tourism and recreation asset which could be used as a means of presuming against wind energy development. There are many core paths and there is no evidence to suggest that wind energy developments detracts against the enjoyment of the countryside;
- OREF suggest that direction be provided as to where to source the Scottish Carbon Calculator in relation to DC4 as this is new to the guidance;
- Consideration should be given to the definitions used for small, medium and large wind energy developments (perhaps referencing kW output); and
- Further consideration needs to be given to the need for a Landscape and Visual Impact Assessment for all small and medium developments taking into account additional costs to domestic, small businesses and farms who are likely to be the main developers of small and medium developments.
- Finally the OIC may wish to consider referencing the fact that Orkney was home to the largest wind turbine in the world from the mid 1980’s till the late 1990’s and that historically large wind mills and in the early/mid 1900s micro wind turbines were very common in the Orkney landscape. This latest growth in the use of wind is therefore not un-precedented.

In addition to the above OREF understand that grid issues are not currently a material consideration as part of the planning process; however it is felt that over the next few months there may be outcomes from the Grid Steering Group Committee that could have a bearing on the Wind Energy Guidance and future reviews of it. As a result OREF would welcome the opportunity to feed in to the development of study briefs and be engaged with during the Capacity Studies as well as the development of any new Wind Guidance.

On behalf of OREF I would like to take this opportunity to thank the OIC for their participation in an informal feedback session on the draft guidance held at the St Magnus Centre on 21 November.

I trust the feedback provided is useful, should you have any questions or wish to discuss any aspect of this further please do not hesitate to get in touch.



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Yours sincerely

Inga Burton
On behalf of OREF Board of Directors and Members