

Respondent	Summary of Comment	Response
1. Royal Aberdeen Golf Club	The presence of golf courses and the landscape impact on them should be listed as a constraint to the development of wind turbines. The development of wind turbines could impact on tourism related to golf courses. Scottish Planning Policy (paragraph 90) indicates that planning authorities should consider tourism and recreation interests when identifying potential areas with potential constraints on wind farm development.	It is accepted that the presence of golf courses should be taken into account when determining applications. Section 2.8 has been amended to not that it is important to give consideration to the impact on tourism. Golf courses have not been specifically identified as all tourist uses should be considered and a list may exclude some uses.
1. Royal Aberdeen Golf Club	Title section 4.10 Tourism, Recreation and Countryside Access Statement.	Accepted, section 2.8 is now titled Tourism, Recreation and Countryside Access.
1. Royal Aberdeen Golf Club	The presence of the turbine at Site 13 Claymore Avenue has led to problems caused by noise, shadow flicker and landscape impact, all of which have been to the detriment of the golf course at Royal Aberdeen. There is also the potential for future difficulties arising as a result of ice throw.	These issues are dealt with in the guidance and an assessment of the impact will require to be made.
1. Royal Aberdeen Golf Club	Guidance should address community consultation, it is recommended that all applicants proposing wind turbine developments be asked to describe any community consultation that has been carried out. It is possible that this could be considered as part of the measures which have been recommended by the ombudsman, which require that the Council review its neighbour notification procedures.	It is not the role of supplementary guidance to set the requirements for consultation for planning applications. This is set nationally through legislation.

1. Royal Aberdeen golf Club	Support the recognition of the golf course as a local nature conservation site and the adjoining land being a prime landscape feature.	This is noted.
2. Forestry Commission Scotland	<p>It is common that wind turbines are located in, or near to afforested land, sometimes with the need for the permanent removal of trees for the development of the turbine locations, access or windflow.</p> <p>The Scottish Government has a long-term plan to expand the woodland cover in Scotland (outlined in the Scottish Forest Strategy) and there is a general presumption against the permanent loss of woodland.</p> <p>To help manage the permanent loss of woodland through economic development, the Scottish Government has produced a policy on The Control of Woodland Removal (2009).</p> <p>The policy requires compensatory planting, to mitigate permanent woodland loss through economic development.</p> <p>It would be appropriate that section 4.3 Ecological Assessment and 4.4 Landscape Assessment include reference to the Control of Woodland Removal Policy and that the policy document is referenced as a source of further information for those development sites located in, or near to</p>	Accepted, the suggested wording has been incorporated into the guidance.

	afforested land.	
3. Alistair Watson	Section 1: I am not sure where your 40% has come from. This is different from 2020 Routemap for Renewable Energy in Scotland (2011) and the update from 30 October 2012 but I do sometimes get lost in numbers so please let me know where the 40% comes from if it is actually the correct figure.	The current figure is now 100% and the Supplementary Guidance has been amended accordingly.
3. Alistair Watson	Section 3: With reference to Appendix 1 I see you are sharing the 'Shire's categories (in terms of capacity) to describe the scale of installation. SNH consider the term small scale to include up to 3 turbines whilst the City/Shire category includes 4-10 turbines. I thought it worth mentioning that I suspect this may be confusing to developers who are more familiar with the SNH guidance and terminology (i.e. 1-3 small scale, 3-20 medium scale, 20-50 large scale, 50+ very large) but I accept you may have better reasons to be consistent with the 'Shire on this categorisation.	There are different methods for categorising wind turbine developments. For the purposes of this guidance the advice is not linked to the scale range and has been removed.
3. Alistair Watson	Section 4: Environmental IMPACT Assessment Regulations (word missing).	This has been amended.

<p>3. Alistair Watson</p>	<p>SECTION 4.10: As an extension of what Rachel has suggested, I recommend that open spaces (such as the top of Brimmond Hill where people walk quite freely without being on a defined path) are also taken into account. Many of our parks should already be caught under the headings under Section 4.9.</p> <p>I suggest something along the lines of: <i>"Assessment will need to include the impacts on core path network and other types of paths and open spaces of special importance for outdoor recreation, both on land and in inland water where appropriate. Examples of open space of special importance for outdoor recreation could include parks, Local Nature Reserves, Local Nature Conservation Sites"</i>.</p> <p>My following comments are mostly in relation to the upper end of capacity/scale of your guidance so I think that there should be a caveat about proportionality: Impacts which should be considered, where appropriate, include (but are not limited to):</p> <ul style="list-style-type: none"> - Direct impacts on routes through temporary or permanent closure or diversion of routes; - Changes to character, amenity or intrinsic appeal of routes through changes in surface types or widening (this can have positive effects as well 	<p>The suggested wording on access has been incorporated into a new section 2.8 on Tourism, Recreation and Countryside Access.</p>
---------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------

as negative effects);

- Creation of new tracks (which is more likely to have a positive effect in most cases but could still have a negative effect on character of some semi-natural sites);
- Intrusion into an area enjoyed by recreational users for its semi-natural or wilder qualities by both visual impacts and noise impacts;
- Displacement of wildlife enjoyed by recreational users reducing the appeal of the site (this will be informed by the ecological impact assessment);
- Sequential cumulative visual impacts along longer distance linear routes (e.g. the Deeside Way) and in combination/in succession impacts from particular locations where many schemes are visible from one location. This should take into account developments in the 'Shire as well if there is a significant degree of visibility from the viewpoint. In terms of impacts on outdoor recreational resources this is unlikely to become an issue unless there will be nearby developments along our boundary with the 'Shire.

I would be more than happy for this to be condensed like the preceding sections of your guidance but consider these to be areas which could have a significant negative (or positive) impact on outdoor access and recreation in particular cases if sufficiently large develop (or number of developments) appear in areas of

	<p>particular sensitivity.</p> <p>As you no doubt understand there is a great deal of overlap with the more general visual impact assessment but also to a more limited extent the landscape because the designations and character could be the initial draw for recreational users to a particular area. I would emphasise that much of the information used to make an assessment on impacts on outdoor access interests would probably just be references to information already gathered for other chapters of the assessment (e.g. LVIA, EclA, cultural, noise etc.) so this should not be viewed as onerous additional effort. Location and scale mean that most issues above would only be relevant for larger installations around the edge of the city.</p>	
3. Alistair Watson	<p>If you are referencing 'Siting and designing windfarms in the landscape' (2009) then you should probably also mention 'Siting and Design of Small Scale Wind Turbines of between 15 and 50 metres in height' (2012)</p> <p>http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/landscape-impacts-guidance/.</p>	This has been added to the references section.
3. Alistair Watson	<p>For larger developments 'Good practice during wind farm construction' gives good general guidance which is also worth considering for smaller schemes which may share similar issues</p>	This has been added to the list of references.

	<p>such as track formation: http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=1618</p>	
3. Alistair Watson	<p>It should not be forgotten that in addition to direct loss through removal for track creation, foundations and hardstanding that peat habitats can also be adversely affected by changes to hydrology, possible erosion and/or enrichment of soils. It may be worth mentioning these other potential impacts as well.</p> <p>The guidance I mentioned above 'Good practice during wind farm construction' is a good starting point for further more specific information on peat survey and construction on peat.</p> <p>Again something which is most relevant at the top end of capacity/scale covered by the guidance, Section 4.15 or the further information section of the document could make reference to the Scottish Government pages on wind energy developments on peat land: http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Energy-sources/19185/17852-1/CSavings</p>	<p>The advice on peat land has been incorporated into the 2.2 Environmental Impact section and this has been expanded to incorporate advice from SEPA and highlights these issues.</p>
4. SEPA	<p>We welcome the recognition of peat as an important habitat and carbon sink and that developments should be designed to minimise</p>	<p>The advice on peat land has been incorporated into the 2.2 Environmental Impact section and this has been expanded to cover wetlands and covers the issues raised.</p>

	<p>disturbance to peat and soil. We acknowledge that within the city boundary there is limited scope for peat however the advice in the draft SG could be improved to provide information and clarity to the development industry regarding impacts on peat.</p>	
	<p>Similar to peat we promote an approach of avoidance of wetlands. Groundwater dependent terrestrial ecosystems (GWDTEs), which are types of wetland, are specifically protected under the Water Framework Directive. The results of the National Vegetation Classification survey should be used to identify if wetlands are GWDTEs.</p>	<p>The advice on peat land has been incorporated into the 2.2 Environmental Impact section and this has been expanded to cover wetlands and covers the issues raised.</p>
4. SEPA	<p>roads, foundations and other construction works associated with large scale developments can disrupt groundwater flow and impact on existing groundwater abstractions (such as abstraction for private water supplies).</p>	<p>The advice on peat land has been incorporated into the 2.2 Environmental Impact section and this has been expanded to cover wetlands and covers the issues raised.</p>
4. SEPA	<p>Windfarm developments can include elements which require engineering works in the water environment e.g. bridges or culverts for new or upgraded access tracks. Windfarm developments should be designed to avoid the need for new watercourse crossings, and where such works are necessary then the following information should be submitted</p> <ul style="list-style-type: none"> • A site survey of existing water features; • map showing the location of all proposed 	<p>The advice on peat land has been incorporated into the 2.2 Environmental Impact section and this has been expanded to cover wetlands and covers the issues raised.</p>

	<p>engineering activities;</p> <ul style="list-style-type: none"> • systematic table detailing the justification for each activity along with proposed mitigation; • an indication of the proposed design (e.g. bridge, bottomless culvert, arched culvert); • photo of each affected waterbody including its dimensions design <p>Where flooding may be an issue a flood risk assessment may also be required.</p>	
4. SEPA	The construction phase includes construction of access roads, borrow pits and any other site infrastructure. We recommend that this issue is highlighted in the Supplementary Guidance.	The advice on peat land has been incorporated into the 2.2 Environmental Impact section and this has been expanded to cover wetlands and covers the issues raised.
4. SEPA	Borrow pits can be particularly large and may resemble small quarries. The need and proposed location of borrow pits should therefore be determined at the planning application stage, as the impact of these facilities (including, impact on water and blasting) needs to be appraised as part of the overall impact of the scheme in accordance with Planning Advice Note 50 Controlling the Environmental Effects of Surface Mineral Workings . Restoration measures for the borrow pits must be detailed as part of the overall development proposals. The location of borrow pits is therefore an important consideration in the layout of a wind farm and should be sited well	The advice on peat land has been incorporated into the 2.2 Environmental Impact section and this has been expanded to cover wetlands and covers the issues raised.

	away from watercourses and not on steep inclines.	
4. SEPA	In addition there are guidance documents which may be useful to include references to include in the Supplementary Guidance.	These have been added to the list of reference materials.
5. Transport Scotland	4.5 Visual Assessment - This should be updated to highlight the points from which the wind turbine(s) will first be seen from the trunk road. Wind turbines should not be positioned such that they appear abruptly at a location where drivers require to manoeuvre, react or make decisions (e.g. junctions, bends etc.). Therefore, it is important to identify the point at which the wind turbine(s) first come into the driver's view so it can be demonstrated that they can be clearly seen in advance of such a location.	A new section, 2.6, has been added to cover trunk road safety requirements.
5. Transport Scotland	4.7 Shadow Flicker - The assessment should be expanded to include the impact on the trunk road network rather than being limited to buildings.	A new section, 2.6, has been added to cover trunk road safety requirements.
5. Transport Scotland	4.8 Ice Throw - The sentence on warning signage should be removed in relation to the trunk roads. For trunk roads we would expect that "Where evidence of vibration and/or climate sensitive technology is provided there should be no need to consider this issue further. If no evidence of this vibration and/or climate sensitive technology is available then the wind turbine should be sited at least 100 metres from the	A new section, 2.6, has been added to cover trunk road safety requirements.

	<p>nearest kerb line of the trunk road carriageway". It is recommended that the guidance be updated accordingly.</p> <p>The following should also be added regarding potential structural collapse "Set back distance to be a minimum of 1.5 times the height of the wind turbine (from ground level to the uppermost tip of turbine blade) away from the nearest kerb line of the Trunk Road carriageway". Please add "For sites near the trunk road, Transport Scotland should be consulted. Pre-application discussions are welcomed."</p>	
6. Culter Community Council	<p>Introduction: Line one;energy technologies <u>of all types and</u> on all scales..... Line 6;the range of <u>onshore</u> technologies available</p>	Agree to change.
6. Culter Community Council	<p>4. Para 2; 3rd sentence;<u>with their application to help speed up the application process.</u></p>	This pro-forma is no longer used by the consultees and reference to this and the copy in the appendix has been removed.
6. Culter Community Council	<p>4.1 Add in a further bullet point on 'noise levels of each turbine (of the machinery and of moving parts through the air)'</p>	This is to cover the technical specification of the proposed turbine or turbines. There is a separate section that covers the noise impact, 2.3 Noise Assessment.
6. Culter Community Council	<p>4.4 Add another bullet point requiring applicants to 'consider the value of landscape/natural heritage of the site to local residents (and tourists) as a local viewpoint or leisure (eg walking) area'</p>	This is covered by the Landscape and Visual Impact Assessment.
6. Culter Community	<p>4.6 para.1 line 3; replace 'blades' with 'moving parts' – otherwise some designs would appear to</p>	The term blades can apply to both horizontal turbines and vertical fixed turbines.

Council	be excluded	
6. Culter Community Council	4.7 and 4.8 appear to be aimed at 'propeller' type wind turbines? Is this so? If so this should be indicated but all designs should be covered.	This does not differentiate between turbine types and an assessment would apply equally to horizontal turbines and vertical fixed turbines.
6. Culter Community Council	4.12 last para. Should refer to appendix 2 not appendix1	There are no longer any appendices to refer to.
6. Culter Community Council	<p>4.13 para.1 line; For all types of wind turbines power produced depends on <u>3</u> factors – the speed/ strength of the wind and its direction at the proposed site and the efficiency of the turbine design to produce as much power as possible.</p> <p>4.13 para.1 line 2; Does the phrase 'area swept by rotor' refer specifically to the large 3 bladed commercial turbines only and not to all designs? This needs to be clarified.</p> <p>4. 13 para.1 line 4 'the annual mean (that is, average) wind speed data' – what exactly does this mean? If it means obtaining local Met. Office data which is summarised in 'wind rose' form by plotting wind vectors graphically over time (annually) then this would be good as they can show prevailing wind direction and variation in speeds and also seasonal variations in wind speed and direction.</p> <p>4.13 para.2 Very much agree that the applicant</p>	<p>Paragraph 2.10 has been amended to reflect this.</p> <p>It refers to both horizontal turbines and fixed vertical turbines.</p> <p>We encourage that applicants consider the viability of a site before installing a wind turbine. However, it would not be a determining factor in the grant of planning consent. Providing the impact on the environment and community is acceptable the effectiveness of the turbine is the applicants' responsibility. Therefore, no further change is proposed.</p>

	<p>must show the proposal is viable. However micro-turbines should have as much data required (12 months and not just 4 months) as large turbines since wind speeds/strength and direction can differ at different times of year. Given the changes now happening in global and local weather patterns we propose that data is required on 2 levels;</p> <ul style="list-style-type: none"> 1) wind rose data from the local Met Office for the last 5 years ideally but for not less than 2 years because of changing and more extreme weather patterns 2) backed up by 12 months' readings from the anemometers placed on site <p>From this wind data the likely annual generation of electricity (viability) can be calculated which is likely to be much less than the design capacity.</p>	
6. Culter Community Council	<p>We suggest that Development Info. Forms should also be required (Appendix 3? – similar to the MOD, CAA and BAA forms in appendix 2) where site and equipment details are summarised including the calculated viability as well as the generation capacity. This would give the Planning Dept and the public the essential details of the application 'at a glance'.</p>	<p>Section 2.1 Technical Information has been amended to require that this information is submitted in a format that is clear for the planning service and the public to understand.</p>

6. Culter Community Council	4.15 Why not just ban development on peat land to ensure the carbon balance does not become negative?	The first principle of the guidance would be to avoid any peat land or wetland, and in Aberdeen this is not considered to be a significant constraint. However, where there is no alternative location it is important that the impacts are minimised through mitigation. If the benefit clearly does not outweigh the cost there will be the option not to grant consent.
6. Culter Community Council	4.16 Agree with bullet points 1 and 4 but; <ul style="list-style-type: none"> • Bullet point 2 needs to be more specific – e.g. provision of local employment/business or effects (positive or negative) on existing businesses (e.g. tourism) or on informal leisure use of the site? Or what exactly? • Bullet point 3 should be expanded to include negative effects on communities not just benefits. 	The section on other issues is, in part, already covered by the guidance. It is not possible, or necessary, to list and detail all other material considerations within this guidance. Therefore, this section has been removed.
7. SNH	The Guidance Clearly sets out the type of information that will be required for applications but not the level of detail.	The level of detail required for each application will depend on both the scale and location of the proposal and it is not possible to clearly set out what will and will not be required for all developments.
7. SNH	SNH has a wide range of guidance for developers of renewable energy schemes. Recommend that section 4 is amended to include links to our guidance. It would also be helpful to cross reference other relevant supplementary guidance and technical advice.	This has been included in section 2.

7. SNH	We recommend that the first bullet point is amended to read the 'type and number of turbines proposed.'	Accepted.
7. SNH	It may be helpful to specify that ecological assessments must include information on the methods they used. Results should be clearly presented in order to help your Council determining the applications and others who wish to comment, such as local communities.	This requirement has been included in a revised section, 2.2 on Environmental Impact.
7. SNH	Wind turbines and wind farms can have an adverse impact on designated sites even when sited some distance from them. They do not need to be either on or immediately adjoin a site to have such an impact. Our guidance 'Assessing the impact of small scale wind energy proposals on the natural heritage' Where there is the possibility of a negative impact on SPAs a Habitats Regulations Appraisal will be required.	This requirement has been added to section 2 and a map of the designated sites included in Section 3.
7. SNH	The guidance could refer to the SiteLink facility on our website where information on designated sites can be obtained. It would also be helpful to let developers know where they can obtain information on Local Nature Conservation sites.	The map in section 3 now refers to the SiteLink facility.
7. SNH	We recommend that a bullet point is added to assess the impact on species and habitats that are identified in Biodiversity Action Plans. This would help Aberdeen City fulfil its Biodiversity duty. It may also be helpful to define that duty, its rationale and relevance to planning authorities.	This has been added to section 2.

7. SNH	The list of species should be extended to include terrestrial species such as otter, red squirrel and badger. The infrastructure for wind energy developments can have impacts on their resting sites and land they use for foraging. You may wish to include a reference to the North East Biodiversity Records Centre (NESBReC) as a possible source of biological information.	This has been added to section 2.
7. SNH	We recommend a link to our guidance on landscape. This includes siting and design of wind farms and of wind turbines between 15 and 50m height, visual representation of wind farms, visual assessment of wind farms and assessing cumulative impacts.	This has been included in the list of references.
7. SNH	Include designated sites in Aberdeenshire on the constraints map.	A map has been included in section 3 of the Guidance.
7. SNH	Geological and geomorphological sites, both national and local, should be considered as well as nature conservation sites.	Consideration of these sites has been added to section 2.
7. SNH	Consideration should be given to impacts on recreation and amenity such as paths and open space.	A new section on Tourism, recreation and countryside access has been added that covers this topic.