

APPENDIX 2: SPATIAL FRAMEWORK FOR WIND ENERGY DEVELOPMENT: CONSULTATIVE DRAFT SPG: CONSULTATION RESPONSES RECIEVED

Organisation	Comment	Proposed Response	SPG Section
Key Stakeholders			
Scottish Government	<p>However, we have concerns about the methodology used and the departure from the three stage approach set out in Scottish Planning Policy (SPP). There are numerous departures from the SPP approach (as outlined in the diagram enclosed with this letter), and indeed with the absence of the three key maps:</p> <p style="padding-left: 40px;">map 1 'areas requiring significant protection'</p> <p style="padding-left: 40px;">map 2 'areas with potential constraints'; and</p> <p style="padding-left: 40px;">map 3 'areas of search',</p> <p>We are concerned that the Draft SPG does not fulfil the intended role as a functional spatial framework.</p>	<p>SPG has been reworked and now forms 2 parts.</p> <ul style="list-style-type: none"> Part 1: Spatial Framework for developments of 20MW and above (including areas of significant protection, areas of potential constraint and an area of search. Part 2: Guidance for all wind energy developments. 	Whole.
	Antonine Wall World Heritage Site and Buffer Zone – no basis to include buffer zone. SPP says that PAs should not impose additional zones of protection around designations – suggest inclusion under historic environment or tourism in stage 2.	Scottish Government have agreed that we can include buffer zone as an area of significant protection.	Section 5.
	Listed Buildings and scheduled ancient monuments identified as areas requiring significant protection – should be under potential constraints – historic environment.	Agreed.	Section 6.
	Page 28, 3.7.7 - Parks of significant local importance identified as areas of significant protection – no basis	Agreed. Not included in Spatial Framework but in Part 2.	Section 13.

	SPP 'suggests' green belt should be an area of significant protection' SPP doesn't suggest, it states and there is currently no basis for green belt not being in stage 1. Page 21 then says the Falkirk green belt should be regarded as a 'potential area of constraint'.	Agreed.	
	Supporting habitat and connectivity for SPAs identified as a potential constraint – in the case of the Firth of Forth SPA grassland up to 20km away – no basis for inclusion – not a 'regional and local landscape and natural heritage designation'	Partially agreed. Firth of Forth SPA supporting habitat not included in spatial framework but in general guidance. SG have agreed to inclusion of Bean Geese Fields in Areas of Potential Constraint.	
	Includes areas of deep peat as a stage 2 potential constraint – no basis.	Agreed. Moved to Part 2.	
	Supporting habitat and non-designated sites identified as a potential constraint – no basis.	Supporting habitat for Slamannan Plateau SPA included in Part 1, stage 2 as agreed. Part 2 general guidance addressed other supporting habitat and non-designated sites.	
	Flood risk areas identified as a potential constraint – no basis.	Agreed. Moved to Part 2.	
	Edinburgh ASZ regarded as an area of constraint and Glasgow as an area of potential constraint – there is only 'areas with potential constraints' – is this an error?	Edinburgh ASZ an area of potential constraint. Wider consultaion zones excluded, but general guidance in Part 2.	
	500m from dwelling houses – area of potential constraint – no basis for this in SPP approach – there is a guideline separation of up to 2km from cities, towns and villages.	500m buffer excluded from areas of potential constraint in Part 1. Addressed in best practice within Part 2. 2KM buffer applied to all settlement limits as agreed with Scottish Government.	

	In terms of <20MW, we would expect there to be some capacity, and potential for the Council to identify some areas where this would be likely to be supported subject to detailed consideration against identified criteria.	1 area of search identified, using SPP/Online Guidance methodology.	
	The Council has created several 'broad strategic zones' based solely on landscape grounds. This is not functional as 'areas of search' and if you were using it in those terms, it would involve using non-designated landscape sensitivity to limit search areas. Such constraints should not be used to limit areas of search. Our online renewables planning advice for the preparation of spatial frameworks advises that it would be inappropriate to restrict areas of search on the basis of a perceived sensitivity to wind farm developments in locally significant non-designated natural heritage areas. Such considerations are more appropriately dealt with at development management stage, where mitigation might be possible through careful siting and design. The same applies to the other constraints that are not in SPP. In some cases, it may be appropriate to show limiting factors, that are not identified in the SPP three-stage approach, on a map, <u>but this should be done separately and should not limit the areas of search which are required by SPP.</u>	Agreed. SPG has been reworked and landscape guidance is included in Part 2.	

	Section 1.3 first bullet – it is important to get the correct wording here and not infer that there is no potential in ‘areas with potential constraints’ – there is potential in these areas and the existence of potential constraints do not equate to a blanket restriction on development. Suggest a text change from “ <i>those subject to constraint, and those where energy can be potentially accommodated</i> ” to ‘ <i>areas with potential constraints (where proposals will be considered on their individual merits against identified criteria), and areas of search (where appropriate proposals are likely to be supported subject to detailed consideration)</i> ’”	Agreed.	3.2
	Section 2.1 should refer to the new interim target:- The new interim energy target to generate the <u>equivalent</u> of 50% of Scotland's gross annual electricity consumption from renewables by 2015.	Agreed.	3.1
	No need to mention PAN45 – just the online renewables planning advice.	Agreed.	3.3 and 16.9
SNH	Broadly support production of SPG and note that because of the complex range and nature of the constraints affecting the area, it is difficult to meaningfully define specific areas of search for both small proposals and those of 20MW and above.	Noted	Whole
	We note the use of the term ‘Bean Geese Lotting Fields’ and we are unsure of the meaning of the word ‘lotting’. Perhaps this term can be changed to ‘fields used by Bean Geese’.	Accepted	Whole

	We suggest that the wording within paragraph 3.2.11 should be changed to reflect more the 'tests' associated with the 'Habitats' Regulations. Therefore, the text 'The Habitats Directive and associated Regulations will apply, and proposals which could affect the qualifying species are likely to require an appropriate assessment' should change to: <i>'The Habitats Directive and associated Regulations will apply, and proposals which are likely to have a significant effect on qualifying interests will require an appropriate assessment.'</i>	Accepted	3.2.11 (now 8.11)
	Due to the SPG not meaningfully being able to identify areas of search then there is also no meaningful way of conducting an 'appropriate assessment'. SNH content, to rely on the existing policies that will screen proposals for a 'Habitats Regulations Appraisal' (HRA).	Noted. Screening for HRA to be undertaken. HRA screening undertaken for Area of Search and result agreed with SNH.	Whole
	A screening record of the SPG against the 'Habitats' Regulations should be produced to ensure an audit of compliance is maintained.	Accepted – Screening document produced.	Whole
	Although the SPG refers to existing policies that aim to provide suitable protection for the Sites of Special Scientific Interest (SSSIs) within Falkirk we believe that some description of these constraints could be included, along similar lines to the description afforded to SPAs. A section on SSSIs or national sites appears to be missing and should fit between paragraphs 3.2.8 and 3.2.9.	Accepted. Amended international and local sites sections more succinct to fit in new section.	Section 3 (now Part 2 section 8)
	It may be useful to have a section at the start of the SPG describing how it should be used by the reader.	Section 3 – format of Spatial Framework partially addresses this. Revised initial 2 sections of SPG.	Added to 1.4.
	A bibliography might be useful to describe some terms such as landscape character assessment, landscape capacity study etc.	Potentially mean glossary. It is considered that most terms are defined within the text, and/or other documents referred to in the text.	Whole

	It would be helpful to include a map and / or list of existing and consented wind farm schemes within and adjacent to the Falkirk Council area, as these are highly relevant to this SPG. There could be a web link to Council web pages for updated information.	Info will date easily so weblink may be appropriate. This is something that could be easily set up on the website after publication of the SPG.	Whole
	Chapter 3 – Spatial Framework (para 3.1.3) states ‘The spatial framework concludes with a broad spatial assessment of the potential for wind energy development’. This is a critical paragraph and is likely to direct readers straight to Chapter 4. We suggest this sentence reads ‘is followed by’ rather than ‘concludes with’. It might be helpful at this point to briefly explain what the Overall Assessment of Capacity (Ch 4) actually is / does.	Accepted. SPG has been reworked so that constraints are given an overview within Section 19. Readers will require to go through each constraint within the guidance, and can cross refer.	3.1.3
	Too much / detailed landscape information in the main body of the SPG and suggest that this could be put in an Appendix.	The landscape guidance is lengthy and descriptive. However, the table summarising the key points is required within the main SPG within the landscape section.	Now Section 9.
	Sections 3.3.1 to 3.3.3 could provide more on landscape character, as this is the basis of the capacity study. Also, about the range of landscape objectives i.e. landscape accommodation / protection / change, which drives the outputs of the capacity study - paragraphs 7-21 onwards in the capacity study could be used for possible text for the SPG. This could then be used to explain how this is relevant to the overall capacity table (figure 4).	3.3.2 and 3.3.3 clearly delineate ‘landscape’ and ‘visual’. Outputs of Study set out clearly in this section.	
	Para 3.3.5 - incorrect title – ‘Local Nature Conservation Sites’.	Accepted.	3.3.5. Now in Section 8.
	We believe that Figure 2 introduces too many issues such landscape and visual sensitivity / LCA / landmark features & view. We suggest that this section either needs to be expanded or put into an Appendix.	Disagree. Important for general readers to understand basics of methodology.	
	Para 3.3.6 – we believe that ‘turbine typologies’ needs more clarification, particularly to explain how/why this is relevant to the SPG.	Accepted. Paragraph to be inserted explaining range of typologies assessed.	

	Spatial Assessment – re-order according to response		
	<p>Areas of cumulative impact (Para 3.3.12) - There is only one existing development in the Falkirk Council area (Muirhouse). Currently the western part of the council area is affected by turbines in the Gargunnock / Touch Hills. This paragraph highlights the main areas affected by this [1(i), 2(i) and 4(ii)] – and notes they have been allocated lower capacity ‘accordingly’. However, the picture is constantly changing and recent approval at Inquiry of Tod Hill by Denny and rulings on Burnhead and Rullie could have some influence wind farm development across the area. There does not seem to be a mechanism in the SPG to deal with this. We recommend, therefore, that there is a ‘health warning’ – and add that Council will add (reconsider) areas in the future which they believe have reached cumulative capacity.</p>	<p>There is provision in Landscape Capacity Study to allow to Council to decide when an area has reached cumulative capacity. SPG will be reviewed post adoption, and there is scope for re-evaluation of baseline capacity.</p>	<p>Section 3 (now section 9)</p>
	3.3.16 ‘Level of overall level....’ - requires rewording.	Amended.	
	<p>We believe that more mention can be made of Areas of Great Landscape Value (AGLVs), as this is a criteria for ‘areas with potential constraints’ (SPP para. 190) and mapped somewhere in the SPG.</p>	<p>AGLV’s to be reviewed at later date. Overall study deliberately left out local landscape designations for this reason. However section included highlighting AGLVs.</p>	<p>9.14</p>
	<p>Chapter 4 – Overall Assessment of Capacity – this needs to make it clearer that this chapter brings together all the issues in the SPG i.e. that the landscape character units are used as the spatial baseline.</p>	Accepted.	
	Map 9 – not ‘Historic’ Gardens and Designed Landscapes.	This is the correct terminology.	Map 9

Historic Scotland	We also welcome the strong emphasis on protecting the Antonine Wall WHS from adverse impacts as a result of wind energy development, which reflects the recently adopted Antonine Wall SPG.	Noted	Now 13.10 -13.12
	It is important that the SPG makes clear that viewcones and viewpoints identified as part of the Landscape Capacity Study should not be read as comprehensively delineating or describing the setting of heritage assets. Similarly, the identification or omission of specific heritage assets for the purposes of assessing impacts on landscape and visual sensitivity should not be used as a basis for assessing potential direct or indirect (setting) impacts on those heritage assets themselves.	Built heritage has its own section. Enough cognisance is given to the setting. Some additional text included relating to direct impacts and requirement for separate built/cultural heritage study.	All Section 13.
	Recommend that the SPG makes it clearer that wind energy developments can have impacts across local authority boundaries, and that the guidance should apply to any historic features which may be affected, whether within Falkirk Council area or not.	Not accepted. Cross border impacts clearly shown on maps. Plus cross border impacts identified when scoping LVIA anyway.	All Section 13.
	Reproduce full Dev Plan policies in the built and cultural heritage section in the interests of consistency.	Policies replicated in Appendix.	Appendix 1.
	References within the Built and Cultural Heritage section to the Landscape Capacity Study and 'visual and landscape' setting should be reconsidered, to avoid an implication that landscape issues are the principal consideration in terms of understanding historic features and their settings, and in assessing impacts upon them.	References included on direct impacts in Built Heritage section.	Section 13.12-13.16

	Whilst the Environmental Report includes Inventory Battlefields as areas of significant protection, the SPG itself identifies them as areas of constraint. We recommend that the SPG should identify Inventory Battlefields as areas of significant protection, and their settings areas of potential constraint, to provide consistency of protection with the other national designations.	Many battlefield sites are subject to a wide range of land-uses, including new housing and infrastructure, as well as other Development Plan proposals. Specific impacts should be addressed on a case-by-case basis. Given proximity to built up area, larger wind schemes are likely to be precluded anyway.	13.9
	Paragraphs 3.7.6 and 3.7.10 - 3.7.12 all suggest that impacts on historic environment should be assessed in a Landscape and Visual Assessment (LVA). We recommend that historic environment features should be assessed in a specific cultural heritage study rather than an LVA, although where relevant they could also be included <i>additionally</i> (not instead of) in the LVA for specific landscape and scenic value.	Agreed. As well viewpoints in LVIA, reference made in text that submissions may require additional study.	Previously Para 3.7.6 and 3.7.10 - 3.7.12. Now 13.10
	Under 'further guidance', we encourage you to consider including references to Historic Scotland's guidance notes on Setting (www.historic-scotland.gov.uk/setting-2.pdf) and Battlefields (www.historic-scotland.gov.uk/managingchangebattlefields.pdf). We also encourage inclusion of a recommendation for applicants to have early discussions with Historic Scotland regarding potential impacts on historic assets within our remit and how to assess them.	Agreed. Revised built heritage section.	Section 13.

	We recommend that that paragraphs 3.11.1 and 3.11.5 of this section should be expanded to include references to the potential for direct and indirect (setting) impacts on the historic environment (distinct from visual impacts) which may arise from ancillary development relating to wind energy developments.	Addressed in Built Heritage section.	Section 13.2-13.3
	Whilst we would not expect comprehensive identification and discussion of heritage assets in each Landscape Character Unit, we suggest that a general prefacing paragraph is included which recognises that, whilst heritage assets are too numerous to mention individually, there are likely to be heritage constraints in all LCUs, either from heritage assets within the LCU boundary, or in terms of potential setting impacts on heritage assets outwith the LCU.	Include in Key Constraints. Would not want to confuse further with landscape issues.	Section 19.
	In addition to the Antonine Wall WHS and Buffer, those other historic environment designations which cover larger areas (e.g. Gardens and Designed Landscapes and Battlefields) could usefully be mentioned specifically, where relevant, in individual LCU commentaries.	Noted. Included in Key Constraints section.	Section 19.
	Zones A and D: Development of turbines in this zone has the potential to have a significant adverse impact on <i>Thieves' Hill, deserted settlement 400m E of (index 9666)</i> , which may be less than 1km from the nearest point of the proposed zone. It also lies less than 500m to the southeast of the proposed Zone D. We would therefore recommend that the setting of this monument is carefully considered in any proposed Broad Strategic Zones. Redrawing the northernmost part of Zone A and the southernmost part of Zone D to ensure that adequate protection is achieved for this monument could provide additional guidance to developers in this instance.	Noted. Further consideration was given to 'Broad Strategic Zones' as set out in Landscape Capacity Study. These have now been deleted.	Section 9 – (all) and Section 19 (all)

	Zone E presents a potential cumulative impact on <i>Thieves' Hill, deserted settlement 400m E of (index 9666)</i> and on <i>Slamannan, motte (index 1737)</i> , if Zones A and D are taken forward.	Noted. Further consideration was given to 'Broad Strategic Zones' as set out in Landscape Capacity Study. These have now been deleted.	Section 9 – (all) and Section 19 (all)
	Zone B: the setting of <i>Blackbraes, coke ovens, Muiravonside (index 4329)</i> should be carefully considered as part of any wind energy development in this area. Nevertheless, we believe that there is potential to develop a wind energy facility in this area without significant adverse impacts on this scheduled monument.	Noted. Further consideration was given to 'Broad Strategic Zones' as set out in Landscape Capacity Study. These have now been deleted.	Section 9 – (all) and Section 19 (all)
	Zone G: we have significant concerns regarding the potential of turbines in this location to have a significant adverse impact on the Antonine Wall WHS, associated and nearby scheduled monuments. From the information we have available it would appear likely that turbines would be visible in key views from parts of the WHS and scheduled parts of the Wall, and in the background of views towards <i>Kinneil House, house and surrounding grounds (index 90189)</i> and <i>Kinneil, church and graveyard (index 4970)</i> . These potential impacts are likely to be significantly adverse. These probable impacts give rise to significant concerns and we would strongly recommend that a more detailed assessment of the potential of Zone G to accommodate turbines is undertaken prior to its inclusion in any finalised spatial strategy. Where significant impacts to be predicted, we would recommend that wind energy development is not taken forward within this zone.	Noted. Further consideration was given to 'Broad Strategic Zones' as set out in Landscape Capacity Study. These have now been deleted.	Section 9 – (all) and Section 19 (all)

RSPB	It would be useful if there was some reference to potential off-site impacts to designated sites, through factors such as the disruption of hydrological systems.	Is mentioned in 3.5.1 (soils) I think that the spatial identification of rare soils and wetlands of probably enough.	
	In paragraph 3.2.16 we would recommend the reference to May – September dates, as this may cause some confusion regarding winter bird surveys, which are also extremely important.	Removed reference to dates. Replace with 'Timeous Bird Surveys'	3.2.16 (now 8.16)
Stirling Council	Conclusions of LCU's adjoining Stirling Council area accepted. These reaffirm the Stirling landscape Capacity Study and areas of significant protection.	Support noted	
	Wind energy developments can impact on heritage assets beyond the Falkirk Council area, including views to and from Stirling Castle, the Wallace Monument and the Bannockburn Battlefield. SPG should make reference to this.	Noted. SPG makes extensive reference to cross-border impacts on number of constraints. Additional references included in Built heritage section.	13.2.
	Supports approach of safeguarding Firth of Forth SPA	Support noted.	
SEPA	Consider location of built elements in relation to sensitive receptors;	Additional guidance available elsewhere: Particularly joint publication 'Good practice during wind farm construction.'	
	Carbon balance of the project;	Scottish Government Guidance available, plus calculator and spreadsheet available for developers to use. Reference made to this, particularly in Soils section.	Section 11.
	If applicable, impacts upon peat hydrology and peat stability to be considered;	SEPA's Regulatory Position Statement 'Developments on Peat' covers this. Included in Bibliography.	Section 11.

	The pollution prevention principles to be adopted during the construction, operational and decommissioning stages of development of the proposed site including permanent and temporary foul and surface water drainage, oil and chemical storage, working in adverse weather conditions and environmental management;	Additional guidance available elsewhere: Particularly joint publication 'Good practice during wind farm construction.' Also: 'Pollution Prevention Guidelines relevant to construction (published by SEPA) http://www.netregs.gov.uk/netregs/links/63901.aspx plus "CIRIA Control of water pollution from linear construction projects. Technical guidance (C648) (2006). http://www.ciria.org/acatalog/C648.html "	
	Buffers to sensitive receptors such as peatlands, wetlands, watercourses, lochs and water supplies (private and public);	Not appropriate to buffer wetlands as this would not be in accordance with SPP. Would also result in spatial clutter on maps and should probably be assessed on a site by site basis anyway.	
	Hydrology and drainage including abstractions, impoundments and watercourse engineering including crossings;	In existing SEPA/SNH guidance.	
	Waste management (including peat and soil); and	In existing SEPA/SNH guidance.	
	Borrow pits including location, operation and restoration.	In existing SEPA/SNH guidance.	
	We note that a number of these issues have already been considered in the development of the draft SPG. However, there are issues surrounding peatland, waste and the protection of the water environment that could benefit from more detailed guidance in section 3.11.	Have made further ref to existing guidance.	3.11

	<p>Although the spatial strategy includes areas of peatland and wetlands as a constraint isolated pockets of these habitats may still be present on chosen development sites. If there are wetlands or peatland systems are present the planning application should demonstrate how the layout and design of the proposal, including any associated borrow pits, hard standing and roads, avoid impact on such areas. Peatland (active blanket bog in particular) should be avoided. A Phase 1 habitat survey may be required to identify areas of wetland and demonstrate that they have been avoided. Where the proposed infrastructure will impact upon peatlands, a detailed map of peat depths should be submitted. The peat depth survey should include details of the basic peatland characteristics.</p>	<p>Include in general guidance – caveat peat/wetland section.</p>	<p>Sections 11 and 12.</p>
	<p>For areas where avoidance is impossible, details of how impacts upon wetlands and peatlands are minimised and mitigated should be provided as part of the planning application. This should consider the drainage, pollution and waste management implications and include preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, dewatering, excavations, drainage channels, cable trenches, or the storage and re-use of excavated peat.</p>	<p>Reference to key guidance from SEPA and SNH on peatlands and wetlands is included in Bibliography. Guidance in SPG guides readers towards this.</p>	<p>Section 11 and 12.</p>

	<p>As best practice we recommend a buffer distance of 100m between ground water dependent terrestrial ecosystems (particular type of wetland) and roads, tracks and trenches, and a larger separation distance of 250m from borrow pits and foundations. These separation distances will ensure that these ecosystems are adequately protected and prevent habitat loss.</p>	<p>Would result in spatial clutter on maps and should be assessed on a site by site basis. Willing to include this in guidance but advise further discussion with SEPA/SNH. Have added in to Section 17 guidance.</p>	Section 17.3
	<p>Generation of waste material (particularly peat) from wind energy developments to be has the potential to cause significant environmental effects. The creation of borrow pits, turbine foundations and other areas of hardstanding can often involve result in significant volumes of peat being extracted. Once extracted the surplus peat comes waste, and needs to be dealt with in a similar way to other waste streams. We consider the disposal of significant quantities of peat as being landfilled waste, which is unlikely to be consentable under our regulatory regimes.</p> <p>To address this issue we recommend that a Site Waste Management Plan is included as part of the Construction Method Statement. This should detail how all waste streams, including waste peat, soils and refuse will be minimised during the construction of the development. The outline principles should be detailed, including recycling and re-use proposals and how and where waste will be disposed of. It is important to note that peat disposed at depth must be considered in the context of waste being landfilled, and may not be consentable under our regulatory regimes..</p>	<p>Further guidance can be found in SEPA's Position Statement – Developments on Peat – SPG makes reference to this in document and includes link to guidance.</p>	
	<p>SEPA cited general guidance re borrow pits.</p>	<p>This is a general construction issue and can be dealt with by links to guidance.</p>	

	It may also be helpful to include a list of supporting information that potential applicants will need to submit with the planning application in the additional guidance section. In terms of our interest this would include; site layout plans which illustrate the location of all built elements, including access roads, turbines, crane hardstanding, borrow pits, construction compound, welfare facilities, oil storage, cabling and substation so that we can assess their location in relation to sensitive receptors such as peatlands, the water environment (water courses, lochs, wetlands and ground water), and public and private water supplies.	Guidance note on required info is included as an appendix.	Appendix 6.
Community Councils			
Polmont Community Council	Wallacestone Monument should be listed in Appendix 3 as it is a key viewpoint	Wallacestone southern edge is listed on Map 6 as key view from roads, Principal routes with views, and the ridge is identified. This will probably suffice.	Appendix 3
	Parkhill Estate should be listed in Ecological sites	List of Ecological sites are dictated by Falkirk Council Local Plan.	Appendix 5
	Fairy Glen (Adjacent to Grandsable) should be listed as an ecological site	List of Ecological sites are dictated by Falkirk Council Local Plan.	Appendix 5
Larbert, Stenhousemuir and Torwood Community Council.	In relation to the proximity to housing we think this should be included at paragraph 2.3.3. It is noted later at paragraph 3.10.6 but it might be helpful to include it earlier as a factor to be taken in to account.	Not sure this is required. Para 3.10.6 is clear enough.	Larbert, Stenhousemuir and Torwood Community Council.

	<p>We understand that the planning officers and committee would consider the requirements outlined within the Framework when making any decision on a planning application. However, if an application goes to appeal, will the Scottish Government reporter take the same factors in to account?</p>	<p>SPG would be a material consideration and will eventually gain enhanced status as part of LDP. Reporter will take cognisance of</p>	Whole
	<p>We note that the document does not make any reference to social, economic and community benefits or developer requirements to support and contribute to the creation of community funds. There should be consideration given either in this document or in further guidance to the provision of training and employment opportunities resulting from the development, links to supply chain development and also links to potential educational spin offs for the community, schools, etc. In relation to the community, there should be more detail of expectations on the funds that would be generated from the development.</p>	<p>Not role of planning process to directly negotiate with developers regarding community benefits. Planning gain must be in accordance with circular 1/2010. Would require to be a separate policy from other areas of Council such as Economic Development.</p>	Whole
	<p>Paragraph 3.6.13 makes reference to private water supplies. There is a notice at Larbert Loch which states it is an emergency water supply but it is not thought to be drinking water. It might be useful to ask for details as suggested in the paragraph, and which may help define its status.</p>	<p>Private Water Supplies are a civil matter.</p>	12.13

Wind Energy Developers			
Atmos	The approach taken could be too prescriptive and considered to be at odds with SPP in para 187 which states that Planning authorities should support the development of wind farms in locations where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed.	SPG has been reworked and is in line with SPP.	Whole
	Our clients are particularly concerned with your assessment of Landscape Character Area (LCA) 3(iii) Castlecary/Shieldhill Plateau Farmland. This area has been assessed as having 'low-moderate' potential capacity.	Agree with conclusions and assessment of sensitivity with regard to this LCA, as set out in the Landscape Capacity Study	Whole
	The assessment however is applied 'broad brush' over the entire LCA. Clearly parts of the LCA will have effectively no potential capacity, i.e. the Antonine Wall World Heritage Site Buffer and the immediate urban fringe which would be ruled out for specific reasons. These areas would also be 'ruled' out by a potential developer identifying potential sites for development. It should be noted that the area has a history of commercial exploitation in terms of underground and opencast coal and clay extraction and the manufacture of bricks. The protection suggested for the Shieldhill plateau does not appear to take account of the existing prominent communication masts at the east end of our proposed site. Other parts of LCA have potential taking into account the various constraints.	Methodology for identification and classification of LCUs is clear. The Landscape Capacity study clearly sets out how the key sensitivities were identified, and applies this to the guidance for each LCA.	Section 9

	Remove landscape constraints/typologies from document. Cited Local govt examples where landscape capacity studies did not provide effective basis for SPG. Highland Region sought to incorporate similar landscape constraints into the equivalent SPG. Despite detailed mapping of a range of landscape and visual constraint layers, together with judgements on cumulative visual impacts, these elements were dropped from the approved SPG. Strategic capacity assessments produced are no substitute for detailed assessments in EIA at a number of wind farm public inquiries, and planning authorities could not rely upon them	SPG/Spatial Framework is intended to be guidance document for Developers on the range of constraints and not a substitute for EIA and detailed LVIA.	Section 9
GreenPower Developments	We believe that a well designed site at Denny Muir can avoid unacceptable levels of impact with regard to the various factors that are presented by the draft SPG against wind development in this area. However, this can only be judged based on a careful criteria based assessment of the merits of the scheme, not through a 'blanket' approach that is implied by rigid application of a spatial framework.	Noted. Agree with conclusions and assessment of sensitivity with regard to this LCA, as set out in the Landscape Capacity Study.	
	Approach to Spatial framework too prescriptive. Proposals should be assessed on own merits.	Noted. Revised SPG approach in accordance with SPP.	
Individuals			
Graham Hammersley, Owner of Carronbridge Hotel	Seeks an exclusion zone around the hotel to 1.5 km to protect visual amenity and invest for the future to improve the visitor experience to the hotel.	Already in area of maximum cumulative capacity are in as identified in Stirling SPG and Landscape Capacity Study. The Hotel is adjacent to areas of low capacity on the Falkirk study to offer a significant level of protection.	

Other Stakeholders			
Edinburgh Airport	Included correct co-ordinates for safeguarding zone	Noted – GIS has been amended.	
Forestry Commission	We are particularly concerned about the loss of woodland due to new (often renewable related) development across Central Scotland and, as a result of this, I would advise the inclusion of the Scottish Government's Policy on Control of Woodland Removal (SPP para 148 and attached here for your attention). This policy seeks to protect the existing forest resource and support woodland removal <u>only</u> where it would achieve significant and clearly defined <u>additional</u> public benefits.	All proposals would be assessed against Policy EQ26 of the Falkirk Council Local Plan. This policy seeks to avoid tree loss where felling would be detrimental to landscape, amenity or nature conservation objectives.	
	Where woodland is removed in association with wind-technology development, there will be a strong presumption in favour of compensatory planting.	Forestry Commission owned/managed woodland has been promoted recently for wind energy projects. Trees would only be felled for wind energy where it fitted in with their commercial interests. Compensatory planning would be undertaken where appropriate and the level assessed on a case-by-case basis, in accordance with Policy EQ26.	