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GV9248/AF

19th February 2019

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Dear Charles,

**SSE GENERATION DEVELOPMENT LTD
REPRESENTATIONS TO SCOTTISH BORDERS COUNCIL LDP2, MAIN ISSUES REPORT**

We write on behalf of SSE Generation Development Ltd in response to the Scottish Borders Council Local Development Plan 2 (LDP2), Main Issues Report (MIR) consultation.

SSE Generation Development Ltd is a subsidiary of SSE Plc which is one of the UK's leading energy companies, involved in the generation, transmission, distribution and supply of electricity, and in the extraction, storage, distribution and supply of gas. Its' purpose is to responsibly provide the energy and related services needed now and in the future.

Its' vision is to be a leading provider of energy and related services in a low-carbon world. Its' strategy is to create value for shareholders and society from developing, owning and operating energy and related infrastructure and services in a sustainable way.

SSE is the owner of Toodleburn Wind Farm which is found between the villages of Heriot and Oxton. The wind farm comprises 12 turbines and has a capacity of 27.6MW. A plan of Toodleburn Wind Farm is attached to this representation.

Toodleburn Wind Farm is a significant wind energy generation asset for SSE. While there are no immediate development proposals for this location, SSE requires a positive policy framework in relation to renewable energy to be established in the emerging LDP2, in particular relating to the future potential to repower and extend these assets.

SSE is also a shareholder in Clyde Extension which comprises a 54 turbine extension to the existing 152 turbine Clyde Wind Farm with part of the site found within Scottish Borders Council administrative area. SSE is also a shareholder in Clyde Wind Farm (Scotland) Ltd.

By way of summary, SSE requests that a clearer policy relating to the wind energy development – including repowering and extension - is established in the Proposed Plan and request that changes are made to the MIR to better support future investment in renewable wind energy developments.

This can be achieved by:

- The provision of a greater emphasis on an evidence based and site specific approach to future wind farm development, instead of a reliance on capacity studies.
- Specific reference to support for repowering existing windfarm locations such as the Toodleburn and Clyde Wind Farms.
- Identifying existing windfarm locations on LDP proposals map.
- Including reference to the acceptance of windfarm developments.
- The provision for and policy support for offshore grid connections, including grid cabling, associated substations and ancillary equipment.

Main Issues Report Local Development Plan

The new LDP2 will replace the adopted LDP and will provide direction on the future growth in the area, with specific relevance to renewable energy development.

SSE welcome that the Council will continue to support proposals for major wind farms within appropriate locations. Paragraph 7.4 states that SESPlan requires LDPs to identify opportunities for repowering of existing wind farm sites.

SSE is firmly of the view that wind energy will continue to contribute significantly towards efforts to reduce carbon emissions and help tackle climate change.

SSE does not consider it appropriate for the Council's SG on Renewable Energy and the Ironside Farrar Landscape Capacity Study and Cumulative Impact Study 2016 to be used as a policy basis in decision making for wind energy developments, and instead would prefer to see a focus throughout the emerging LDP on the acceptability of development based on the individual planning merits of the proposed development.

Furthermore, an evidence based and site specific approach should be taken to further support wind energy developments rather than a reliance on Landscape Capacity Studies. Consideration should be given not just to Landscape Capacity Studies but also the information contained within an Environmental Impact Assessment Report and supporting planning documentation.

Conclusions

We trust that these comments by SSE in respect of policies relevant to renewable energy development contained within the MIR can be accommodated in the proposed version of the LDP.

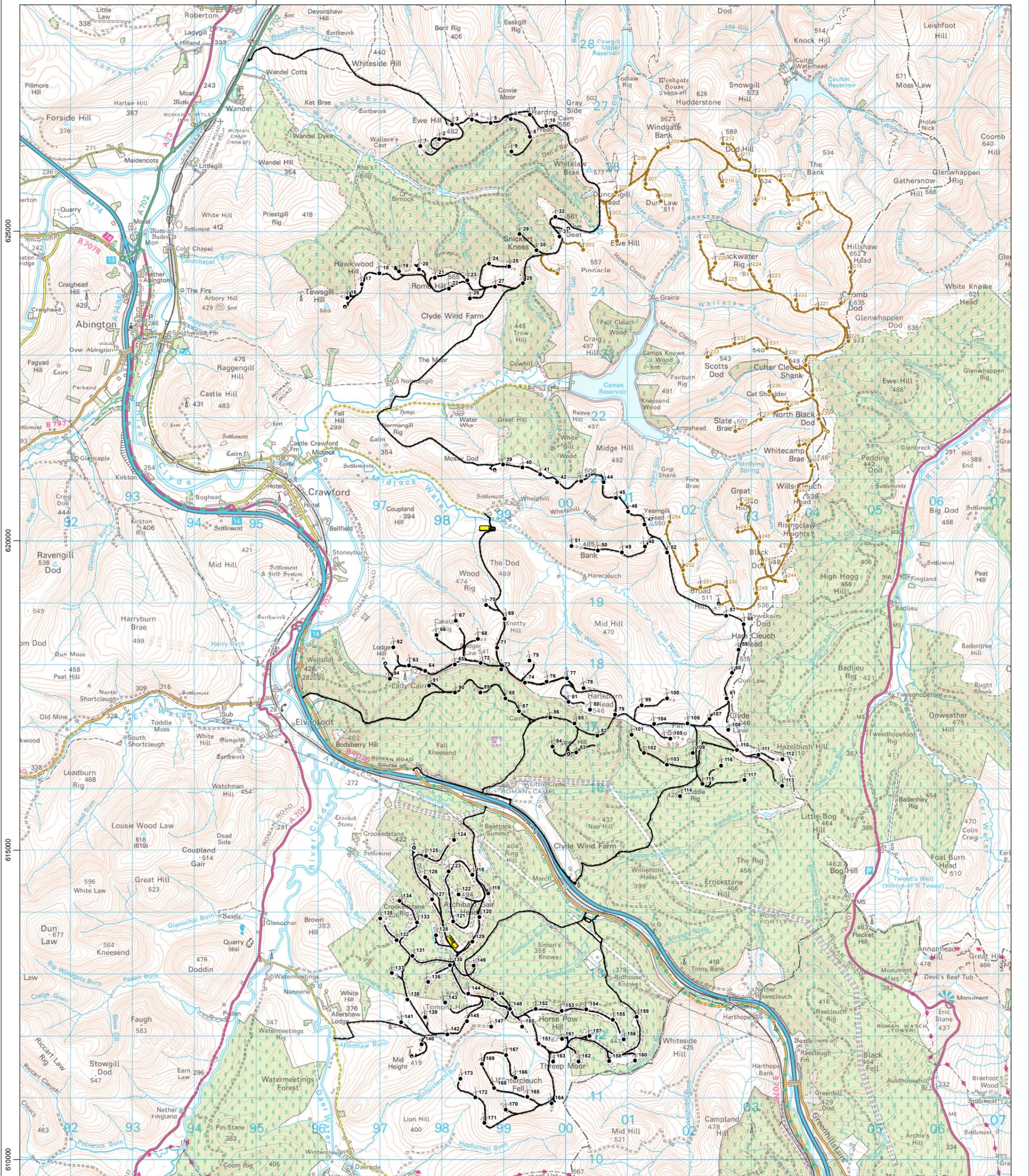
We would welcome the opportunity to meet you to discuss these comments further if required, and would in any event be grateful if you could keep us informed of progress on the LDP as it moves towards the Proposed Plan stage.

Yours Sincerely,



Alan Fitzpatrick
Associate
alan.fitzpatrick@montagu-evans.co.uk

Encl.



Legend

- Clyde Extension Turbine
- Clyde Extension Permanent Met Mast
- Clyde Extension Access Track
- Clyde Turbine
- Clyde Permanent Met Mast
- Clyde Access Track
- Substation



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Project Name

CLYDE EXTENSION

Drawing Title

CLYDE AND EXTENSION AS BUILT

| Rev | Date | Remarks | Drwn | Chkd |
|-----|------------|-------------|------|------|
| R0 | 23/07/2018 | First issue | CT | GW |
| | | | | |
| | | | | |

Drawing Number
LN000024-CLYX-ASB-SK-0001-01

| | | | |
|----------|-----------|--------|------------|
| Scale | Plot Size | Datum | Projection |
| 1:60,000 | A3 | OSGB36 | BNG |

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