

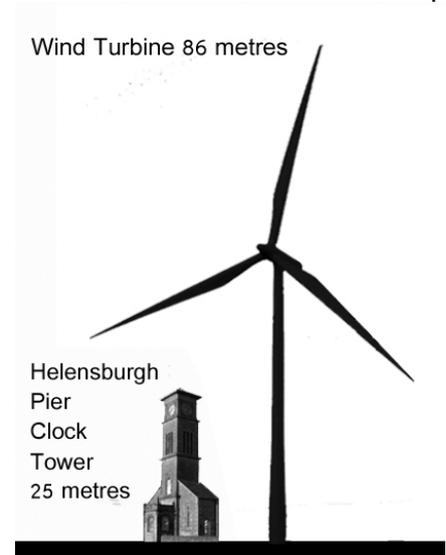
TEG-H

Turbines Evaluation Group – Helensburgh and Area

To : Planning Department,
Argyll and Bute Council,
Blairvadach, Shandon,
Helensburgh, G84 8ND

From : Turbines Evaluation Group – Helensburgh and area
c/o TEG-H Secretary, 40 West Montrose Street, Helensburgh, G84 9PF

Date : 9th October 2014



Objection to planning application 14/01674/PP : wind farm north of Helensburgh

Objection number 2 (of four)

Height of turbines, visual impacts and cumulative impacts

TEG-H is submitting four topic-based objections to this planning application concerning :

1. Landscape
2. Height of turbines, visual impacts and cumulative impacts
3. Economic impacts
4. Other aspects

TEG-H considers that all provide grounds for refusal. The present objection relates to height of the proposed turbines, visual impacts in terms of area and population, and cumulative impacts. Further data can be provided if requested.

Summary of this objection

The chart on page 2 below outlines adverse impacts in this second TEG-H objection paper. Since it includes cumulative impacts, cross-reference is made to other TEG-H objection papers. Scottish Planning Policy (SPP) of 2014, paragraph 169, recognises that **cumulative impacts** arise from 15 considerations listed, as well as “existing and consented energy development”. The summary chart below includes some of those considerations. The detail can be found in the main part of this objection paper or in the other three TEG-H objections. Note also the TEG-H website www.helturbines.org

Topic	Brief summary TEG-H objection
Height of turbines	At 86.5 metres, the proposed turbines are excessively high. Reference is made to details of Argyll and Bute Landscape Wind Energy Capacity Study (2012), Map 5 and pages 39 - 47 of the Appendix. Also to the A&BC scoping opinion dated 22.8.13, pages 1-2. Strong objection.
Visual impacts	Extensive impacts both in terms of area (including the National Park and Clyde Estuary) and population (about 90,000 people affected). Strong objection.
Landscape	See separate TEG-H objection relating to landscape.
Impacts on local economy	See separate TEG-H objection concerning impacts on local economy.
Impacts on communities / residential amenity	Substantial objection, with the turbines only 1.7km from the boundary of Helensburgh.
Impacts on historic monuments and archaeology	Substantial adverse impact on the town's conservation areas (including Hill House) and historic "Garden City of the Clyde". Archaeological details and previously unrecorded 1732 designed landscape on the site are provided in the professional assessment by Fiona Baker, submitted separately as an objection.
Impacts on tourism	See separate TEG-H objection concerning impacts on local economy. Adverse impacts on tourism.
Public access	Relates to recreation and tourism. The proposed development area is flanked by two major long distance countryside paths : the cross-Scotland John Muir Way and the 50 km Three Lochs Way. There would be visual impacts on both, as well as on the local network of paths. There would be no effective gain from the developers' road which could also harm bird life.
Bird life	The RSPB submission (dated 28.8.14) notes high value of bird life and deficiencies of the developers' coverage. The TEG-H one-year survey showed an exceptional range of species on site, including "red list" threatened and rare birds (e.g. Black Grouse, Hen Harriers and others). Details in TEG-H objection 4.

A. Height of turbines

Argyll and Bute Council : Argyll and Bute Landscape Wind Energy Capacity Study (LWECS, 2012) Appendix report part 1, Character Type Key Map - 5 Open Ridgeland, pages 39 - 47

The LWECS Study was commissioned by A&BC and it covers the whole of Argyll and Bute.

For the “Open Ridgeland” site proposed for a Helensburgh wind farm, the study states, “There is no scope for the larger typologies [80m - 130m] to be located in this landscape type without incurring significant impacts on a number of sensitive criteria.”

Thus, the proposed turbines, at 86.5m, are inappropriate. The LWEC study goes further. It notes that this site is visually prominent from the well-settled Firth of Clyde and that the visual sensitivity would be substantial for turbines of that height and even for smaller turbines. The LWECs also mentions proximity to the National Park and that it “would diminish the contrast the Open Ridgeland . . . provides to the more developed coastal areas . . .” That confirms the observation by the Ironside Farrar (2010) report that the twin hills behind Helensburgh provide the backdrop to the town.

The LWEC Study indicates that “medium” sized turbines (50m - 80m) pose similar problems, thus ruling out the 74m high turbines mentioned briefly at one stage.

There are also reservations about the “small-medium” sized turbines (35m - 50m) saying that even that size would have to be situated away from prominent hilltops and ridges “particularly those above Glen Fruin and the Loch Lomond and Trossachs National Park.” And the “small” category (20m - 35m) could only be acceptable if “situated to avoid intrusion on key views to the mountains”.

This report has been adopted by Argyll and Bute Council and is accepted by Scottish Natural Heritage. In its scoping opinion dated 22.8.13 addressed to the developers, A&BC stated “The proposal is not supported by the development recommendations cited in the LWECs. SNH support the capacity study and recommend that the findings are used to inform the strategic pattern of wind energy development in Argyll and Bute.”

CONCLUSION

Turbines of most size categories are inappropriate to the selected site, though smaller ones might be considered if away from the skyline and not overlooking sensitive areas such as the National Park. The present application is inappropriate regarding the proposed turbine height and Argyll and Bute Council has already conveyed that to the developers in its scoping opinion dated 22.8.13.

B. Visual impact

Visual impact is related to height of turbines (see above) and planning concerns for landscape (see TEG-H objection number 1 on landscape).

The criterion of **visual impact** of wind farms appears in the following planning sources.

- Argyll and Bute Council Local Plan (2009), Policy LP REN 1 (c), page 87 (called ‘visual amenity’)
- Argyll and Bute Council Structure Plan (2002) STRAT DC 8 page 27, and STRAT RE 1, third bullet point, p. 36, (called ‘visual amenity’)
- Argyll and Bute Council Proposed Local Development Plan (2013) policy LDP 6 (called ‘visual amenity’), Supplementary Guidance, SG LDP ENV 14, page 11, and SG LDP REN 1, page 42.

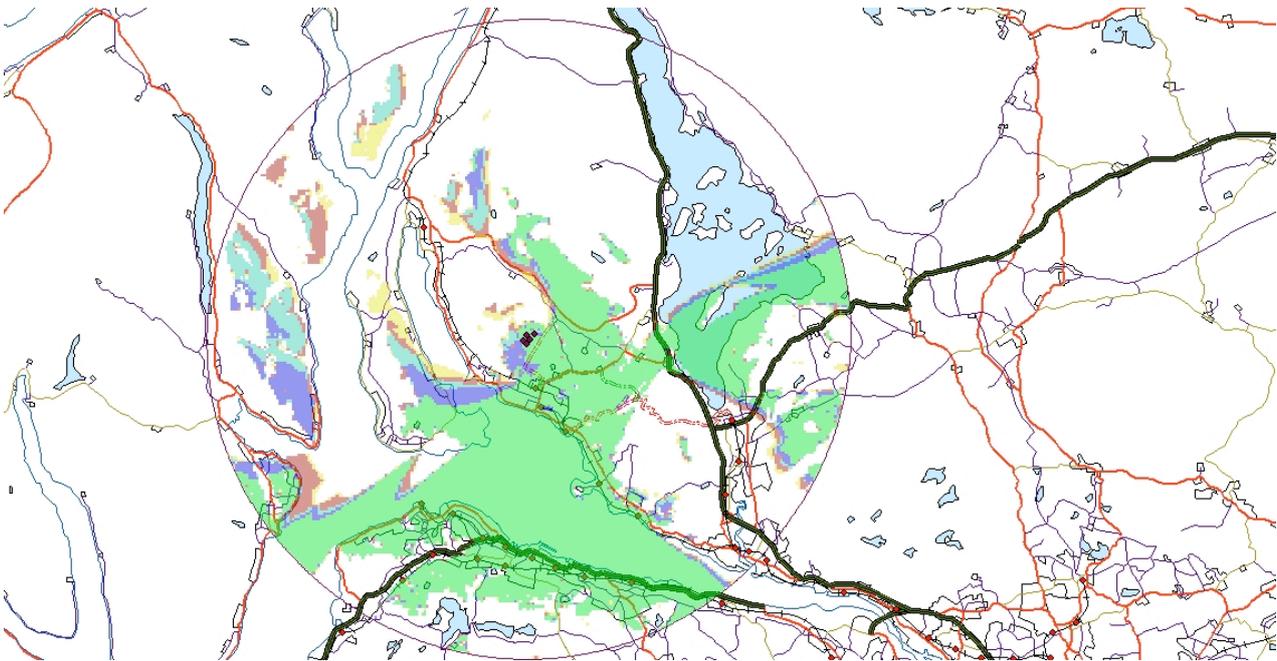
- Argyll and Bute Council Green Belt Landscape Study (Ironsides Farrar report, 2010) pages 16-17.
- Scottish Government Scottish Planning Policy (2014) para. 169, 5th bullet point.
- Scottish Government Circular 4 2009, Annex A, “Defining a Material Consideration”, section 5, tenth bullet point.
- Helensburgh Community Council “Helensburgh Landscape Statement” (2009), list of Key Environmental Features, pages 6-7 (viewpoints as Key Environmental Features) and A&BC Local Plan Glossary under “Key Environmental Features”.

Visual impact relates to **extent of area** from which turbines (or its link road and buildings) would be seen and the **number of people seeing them**. The following are relevant.

1. Zones of theoretical visibility

The developers’ own Zones of Theoretical Visibility show the extensive areas affected : across the lower part of the Loch Lomond and Trossachs National Park, up the Clyde to Cardross and beyond, around the Clyde Estuary, down the Clyde and over to the Rosneath Peninsula as well as the town of Helensburgh.

Below is our image. The circle is 15 km. from the wind farm site, which we understand is the limit regarded by Scottish Natural Heritage as the maximum distance at which it is possible to see individual turbines. The area from which all five turbines would be seen is marked GREEN.



In addition to the **area** of visual impact is the **population** affected. We have made two calculations and each comes to about 90,000 people. So the concern is not just the 14,626 recorded in the 2011 census for the town of Helensburgh, important though that is. For further details, see objection by Dr. G. Riddington.

2. **The proposed road** to convey construction and maintenance traffic would be more than a track in our terminology and, since it would cross open moorland, would be conspicuous from the northern approach to the town. Its intended route would be from the main Helensburgh to Loch Lomond Road (beyond the coup) across open land to above

the second reservoir, then north to the Drumfad wood and to the turbines themselves. If this road ('track') were to be used for more than construction and maintenance purposes (e.g. timber felling transport) the visual impact would be greater.

3. **The Scottish Government's Scottish Planning Policy** (2014), paragraph 169 lists 19 considerations to be taken into account when reaching decisions on wind farms. Visual impacts get mentioned twice. They are of great importance to this case.

4. **Photomontages and visual presentation.** It is noted that **Scottish Natural Heritage** (SNH) has been reviewing the methods used by developers to **convey visual impact**, recognising that existing methods have limitations. The new arrangements, issued in July 2014, will enable the public to view images on line, viewpoints will have to be out to 12.5 miles, and methods will be used to verify that images have been presented correctly.

The SNH report ("Visual Representation of wind farms") states in paragraph 98, **"Visualisations, whether they are hand drawn sketches, photographs or photomontages can never exactly match what is experienced in reality."** (Their emphases.) We agree, but we feel that presenting turbines in very wide horizontal panoramas, while suggesting the generality, fails to show what turbines would look like once the viewer has focused on them in a more compact sight-frame, especially in (less common) urban settings. That is what we have sought to overcome in our images which, we hope, convey an impression of visual impact from places within the town. The need is for both, but we recognise that both modes have limitations. For the new SNH advice see : <http://www.snh.gov.uk/planning-and-development/renewable-energy/visual-representation/>

Below is a more compact TEG-H image. Others can be found on the TEG-H website. In terms of visual impact the turbines would dominate the local town and landscape.



We also argue that the Google Earth "tour" by video, which we provide, adds to the understanding of visual impact. We therefore object strongly on grounds of visual impact.

C. Cumulative impact

The criterion of **cumulative impact** of wind farms appears in the following planning sources.

- Argyll and Bute Council Local Plan (2009), Policy LP REN 1 (c), page 87, introductory paragraph
- Argyll and Bute Council Structure Plan (2002) STRAT DC 8 page 27, and STRAT RE 1, section (B) relate to areas of search, p. 36
- Argyll and Bute Council Proposed Local Development Plan (2013) policy LDP 6 (called 'visual amenity'), Supplementary Guidance, SG LDP ENV 14, page 11, and SG LDP REN 1, page 42.
- Argyll and Bute Council Landscape Wind Energy Capacity Study (2012)
- Argyll and Bute Council Green Belt Landscape Study (Ironsides Farrar, 2010)
- Scottish Government Scottish Planning Policy (2014) para. 169, 4th bullet point

Cumulative impact is defined in the new (2014) Scottish Planning Policy (SPP) Glossary :

“Impact in combination with other development. That includes existing developments of the kind proposed, those which have permission, and valid applications which have not been determined. The weight attached to undetermined applications should reflect their position in the application process.”

Section 169 of the SPP relates this to wind farms by stating :

“ . . . planning authorities should be clear about likely cumulative impacts arising from all the considerations below ^[*], recognising that in some areas the cumulative impact of existing and consented energy development may limit the capacity for further development.”

^[*] “all the considerations below” refer to 15 listed planning criteria to be taken into account when determining applications for wind farms. These include :

- impacts on communities,
- residential amenity,
- landscape,
- visual impact,
- natural heritage,
- public access, long distance walking routes
- historic environment,
- tourism,
- recreation, and
- a range of other aspects.

This is a change from the previous (2010) SPP which did not define cumulative impact, but indicated (para. 188) that it was just impact related to other wind farms nearby. This new elaboration in definition could be significant for determining the Helensburgh wind farm application because of the multiple impacts such a wind farm might have.

Cumulative impact on the wider landscape is presumably included. – e.g. the National Park or the whole Clyde Estuary. The A&BC Scoping opinion refers to the “wider Firth of Clyde area” and to “Inverclyde, North Ayrshire and the urban area of Glasgow”. The A&BC decision regarding a planning application for wind turbines at Toward, for example, stated

that the “Development would be detrimental to the visual amenity of this important part of the Clyde Estuary”. A&BC also objected to a ten-turbines wind farm at Corlic Hill, Greenock, another example of recognition that cross-Clyde impact is recognised as relevant.

The Argyll and Bute Council Local Plan (2009) policy LP REN 1 – Wind Farms and Wind Turbines, page 87, states that wind farms should not have “an unacceptable adverse impact directly, indirectly or cumulatively on . . . physical aspects of sustainable development.” **This application would appear to have such adverse impact.** The Local Plan also lists issues that must be satisfactorily addressed. They include communities, settlements and their settings; and landscape and townscape character, scenic quality and visual and general amenity. The proposed wind farm would clearly impinge on these.

These all appear to be part of cumulative impact and have relevance to Helensburgh. Further, SPP 2014, para. 170, states, “Areas identified for wind farms should be suitable for use *in perpetuity*.” (Our emphasis.) Adverse cumulative impact therefore appears to include future generations as well as ours. Para. 174 allows for expansion of a wind farm, so cumulative impact presumably includes potential increase in visual and other impacts.

Numbers of turbines

The number of turbines considered by the developers has changed over time. Their submission for the A&BC Main Issues Report in 2011 was for a large area of land which included the site currently proposed and much more (letter from Helensburgh Renewables 15. 6.11). That would have accommodated a considerable number of turbines, but it was not agreed by A&BC. In January 2013 Helensburgh Renewables stated that it had no plans to expand, and TEG-H accepts that the developers did not have such plans then. Nine turbines were considered but the current number of turbines proposed is five. However, it does not mean that there could not be expansion in time. That is based on :

- the 2014 Scottish Planning Policy (SPP) statement (para. 170) “Areas identified for wind farms should be suitable for use in perpetuity”, so that anything could happen in the future if that area were to be approved;
- SPP 2014 (para 174) which refers to repowering and enhancing “existing wind farms which are already in suitable sites”;
- the possibility of a precedent being set which could result in more turbines anywhere around the Clyde Estuary, but especially locally.

Thus, it seems that more turbines could follow in time if this application were to be approved.

CONCLUSION

TEG-H suggests that in terms of both visual impact and cumulative impact, as specified in current planning documents, the proposed Helensburgh wind farm is unacceptable and should be refused.