

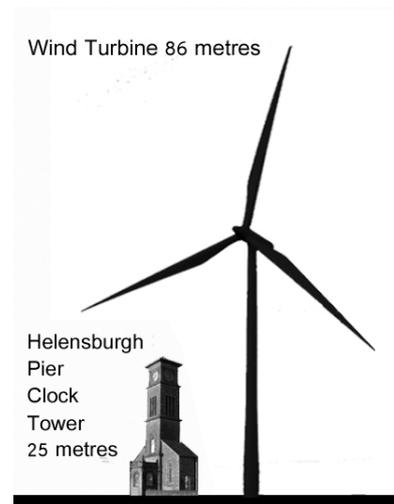
TEG-H

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 : 8th. October 2014



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

Objection number 1 (of four) : **LANDSCAPE**

TEG-H is submitting four topic-related objections to the above planning application. They are :

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

All four provide grounds for refusal. The present objection relates to landscape.

A. Explanation of TEG-H landscape objection to planning application 14/01674/PP.

Landscape underpins other planning concerns about wind farms – such as visual impact, height of turbines, and the economy of settlements which depend on attractiveness.

Landscape has been defined and embedded into the planning system and is fundamental to Scotland's – and especially Helensburgh's – long term welfare.

Helensburgh's countryside landscape matters as the setting for the town. It is an attraction for people to live, visit and spend money here. It links the scenic areas of the Clyde estuary and the National Park. As Stewart Noble wrote in the introduction to *200 Years of Helensburgh* (2002), "We live in an extremely attractive town surrounded by very attractive countryside." Therein lies the essence of Helensburgh's appeal, its residential basis and much of its economic foundation. Its landscape has not been 'industrialised'. The central message is that harm to Helensburgh's landscape could harm Helensburgh's future.

Below key references are listed and each source is explained briefly.

B. Planning references relevant to landscape and wind farms

Landscape is a key planning issue regarding applications for wind farms. It is a listed consideration in the following planning policy documents.

- Argyll and Bute Council Local Plan (2009), Policy LP ENV 1 (c), page 17, and LP REN 1, page 87
- Argyll and Bute Council Structure Plan (2002) STRAT DC 8 page 27, and STRAT RE 1, third bullet point, p. 36
- Argyll and Bute Council Proposed Local Development Plan (2013) policy LDP 6, 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 National Planning Framework 3 (2014) Ch. 4, para. 4.4 & 4.7
- Scottish Government Scottish Planning Policy (2014) para. 29, 11th bullet point, and para. 169, 6th bullet point
- Scottish Government Circular 4 2009, Annex A, “Defining a Material Consideration”, section 5, bullet points 1, 2, 3, 4, 5, 6, 9, 10, 11, 12 and 15
- Helensburgh Community Council “Helensburgh Landscape Statement” (2009), list of Key Environmental Features, pages 6-7 and A&BC Local Plan Glossary under “Key Environmental Features”
- European Landscape Convention (2000)
- Scottish Landscape Forum Report to Ministers (2007)

The European Landscape Convention 2000

The UK ratified the Council of Europe’s Landscape Convention in 2006. The Scottish Landscape Forum’s Report to Scottish Ministers in 2007 stated (page 17), “This step signals the UK Government’s and the Scottish Executive’s commitment to safeguarding and enhancing this central aspect of our natural and cultural heritage, and provides a positive and proactive framework for directing attention to landscape.”

The Convention defines landscape as “ . . . *an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*”. Thus Helensburgh’s landscape is not just the hills, moors, fields and forests which are essential, but the interaction of those with the quality of the town itself.

The phrase “as perceived by people” is crucial since the hill and any power generating plant put on it will be perceived by a large number of people over an extensive area.

Scotland’s Living Landscapes : Places for People (The Scottish Landscape Forum’s report to Scottish Ministers, March 2007)

This Forum, whose report has guided national landscape planning policy, was chaired by Lady Glasgow. She and the Forum’s secretary, Simon Brookes, addressed a public meeting in Helensburgh in 2007, called by the **Helensburgh Community Council**. A representative of the Scottish Natural Heritage also attended.

Lady Glasgow praised Helensburgh’s landscape and emphasised that the national report was intended to be translated into local action. Simon Brookes pointed out that good

landscape brings economic benefits, but on the other hand poor landscape is socially demoralising and a disincentive to investors.

The report argues that the traditional approach of letting landscapes look after themselves is inadequate. It states “Too often landscape change does not bring landscape enhancement” and it urges that “more than ever we need to guide change so as to ensure that we do not lose what we value, or squander what we care for.”

The Scottish Landscape Forum work resulted in “**Scotland’s Landscape Charter**” which was published in 2010, This guides decision makers at all levels. At the level of local authorities it urges : “Recognise the importance of landscape when making key decisions and ensure landscape is included as a key aspect of performance measures.”

Scottish Government : Third National Planning Framework (2014)

This national framework (abbreviated as NPF3) was released shortly before the planning application for the Helensburgh wind farm. Chapter 4 of NPF3 is concerned with landscape. Section 4.4 states “Scotland’s landscapes are spectacular, contributing to our quality of life, our national identity and the visitor economy . . . Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being.”

Paragraph 4.7 recognises the tension between landscape and the drive for renewable energy. It states :

*“We have long sought to protect Scotland’s environment, recognising that it is a dynamic resource rather than a fixed asset. **To better reflect this, more proactive and innovative environmental stewardship is required.** The pressing challenge of climate change means that our action on the environment must continue to evolve, strengthening our longer-term resilience. A planned approach to development helps to strike the right balance between safeguarding assets which are irreplaceable, and facilitating change in a sustainable way. **We must work with, not against, our environment to maintain and further strengthen its contribution to society.** “ (Our emphases.)*

While NPF3 supports renewable energy, it anticipates a shift away from onshore wind in the future. Paragraph 3.9 states, “In time, we expect the pace of onshore wind energy development to be overtaken by a growing focus on our significant marine energy opportunities”, implying a recognition of the shortcomings of onshore wind farms.

Recently a Scottish Government officer has stated (Scottish Energy News, 22.8.14) that renewables operating, consented and awaiting determination, already meet the Scottish Government’s 2020 target for renewables. So fresh emphasis can be put on the NPF3’s statements highlighted above.

Scottish Government : Scottish Planning Policy (2014)

The 2014 Scottish Planning Policy (SPP) has many references to landscape, the natural environment and “green infrastructure”. It is most easily summed up in section 29 :

- *protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment*

Its coverage of onshore wind farms (paras. 161 to 174) is relevant in this context. Among the characteristics to be included in considering the siting of a wind farm (para. 169) are landscape and visual impacts, cumulative impacts, impacts on communities, effects on natural heritage, impact on long distance walking routes and scenic routes, tourism and recreation and a range of other impacts related to landscape.

More detailed reference to SPP (2014) will be given in other sections of the TEG-H four-part objection.

Argyll and Bute Council Structure Plan (2002)

STRAT DC 8 (page 27) states, “Development which, by reason of location, siting, scale, form, design or cumulative impact, damages or undermines the key environmental features of a visually contained or wider landscape or coastscape shall be treated as ‘non-sustainable’ and is contrary to this policy.”

Following this, aspects have been designated as key environmental features* :

- The entry points to Helensburgh and the rural approaches to those entry points
- Hills, open spaces and footpaths nearby to designated Green Belt areas
- Reservoirs and Skating Pond
- Views of Tom na h-Airidh

It is the “wider landscape” that is relevant here. All apply to the proposed wind farm site.

* See ‘Key environmental features’ in the Glossary of the current Local Plan (2009) and the Proposed Local Development Plan, and the Helensburgh Community Council’s list of key environmental features in its ‘Helensburgh Landscape Statement’.

STRAT RE 1, third bullet point, p. 36

This states that proposals for wind farms shall be supported where it can be demonstrated that there is no significant adverse effect on landscape character and visual amenity. It seems that there would be such adverse impact.

Argyll and Bute Council’s current Local Plan, 2009

This states (Policy PL ENV 1, page 17) :

‘All development should protect, restore or where possible enhance the established character and local distinctiveness of the landscape in terms of its location, scale, form and design.’

Its policy LP REN 1, page 87, on wind farms states that (among issues that must be satisfactorily addressed when considering a wind farm) is :

- *Landscape and townscape character, scenic quality and visual and general amenity*

Further reference to the current Local Plan will be given in other sections of the TEG-H four-part objection.

Argyll and Bute Council's Proposed Local Development Plan (2013, but currently at its final phase towards adoption with the Scottish Government.)

Although not yet in force, the Argyll and Bute Council's Proposed Local Development Plan (PLDP) is a material consideration [see *Circular 4 2009, Annex A, section 5, fifth bullet point*] and has relevance to the future. The Scottish Government is currently assessing the PLDP and has noted that the Scottish Planning Policy (SPP, 2014) has been released subsequent to A&BC's approval of it. The Reporter is currently carrying out a further consultation on the wind farm aspects in light of the new SPP.

The PLDP has a section on "Protecting and Enhancing Our Outstanding Environment Together" (page 31 onwards), but unlike the current Local Plan, the PLDP places most of its environmental discussion in the Supplementary Guidance. This states (page 11, SG LDP ENV 14 – Landscape) :

Argyll and Bute Council will consider landscape impact when assessing development proposals, and will resist development when its scale, location or design will have a significant adverse impact on the character of the landscape unless it is demonstrated that:

(A) Any such effects on the landscape quality are clearly outweighed by social, economic or environmental benefits of community wide importance; AND

(B) The Council is satisfied that all possible mitigation measures have been incorporated into the development proposal to minimise adverse effects.

Policy LDP DM 1 permits renewable energy in Very Sensitive Countryside, but only if the site is appropriate, while it is not permitted in Green Belt.

Policy LDP 6 (page 40) supports renewable energy, but only if it can be "adequately demonstrated that there is no significant adverse effect, including cumulative impacts, on local communities . . . landscape character . . ."

Paragraph 4.11.4 states, "While the council seeks to support the further development of renewables throughout Argyll and Bute there [is] also a need to take a sustainable approach by protecting and conserving our outstanding environment, including our landscape . . ."

The section on wind farms and turbines over 50 metres high includes among the planning considerations "Landscape and townscape character, scenic quality and visual and general amenity"

Argyll and Bute Council : Green Belt Landscape Study ("The Ironside Farrar Report") 2010

This study, commissioned by A&BC, examined the Green Belt **and surrounding countryside** in the Shandon to Cardross coastal strip. It identified "The twin peaks of Ben Bowie to the east and Tom na h'Airidh in the west form the broader setting to the town and a backdrop of open moorland and forestry."

Recognising the importance of that backdrop it advocated extension of the Green Belt to the north of the second reservoir and in a broad strip to the north of the road to Loch

Lomond from the Skating Pond to the National Park boundary. That has been included in the PLDP and, if adopted, would mean that part (but only part) of the wind farm site would be in the Green Belt, specifically the start and much of the continuation of the developers' construction road across the moorland.

Argyll and Bute Council : Argyll and Bute Landscape Wind Energy Capacity Study (2012)

This study was commissioned by A&BC and it covers the whole of Argyll and Bute. Rather than explain it in detail here, the conclusions regarding the site proposed for the Helensburgh turbines are discussed in the second TEG-H objection under "Height of Turbines". All that needs to be noted here is that the proposed turbines exceed guidelines by a large amount and would have marked impact on landscape.

Helensburgh Community Council (HCC) : "Helensburgh Landscape Statement" 2009

The HCC Landscape Statement includes :

Landscape is central to Helensburgh's social welfare and economic success.

- *It provides the context for our daily lives and increases a sense of well-being*
- *It stimulates better health through recreation and refreshment*
- *It is a major attraction for tourism which is economically important*
- *It attracts inward investment and retail trade*
- *People like to live in attractive places and this is primarily a residential town*
- *We should pass high quality landscapes on to future generations.*

Landscapes can be degraded too easily. . . Creeping degradation from insensitive decisions on both small and large projects must be avoided.

The HCC Landscape Statement includes Key Environmental Features (KEFs) which are recognised as material considerations in any planning application if listed by a community council. (See Glossary of the current Local Plan and the Proposed Local Development Plan.) The listed KEFs include :

- The entry points to the town and the rural approaches to those entry points
- Reservoirs and skating pond area
- Views to Ben Bowie
- Views to Tom na h'Airidh [*the hill on which it is proposed to site the wind farm*] from the west.

CONCLUSION

It is clear from the above that there are multiple planning reasons for refusing the planning application for a wind farm on the hill overlooking Helensburgh on **landscape grounds** alone. That is before all the other factors suggesting refusal are taken into account