

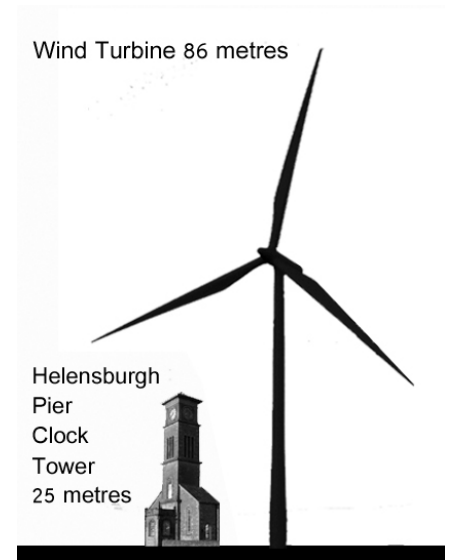
TEG-H

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 : 21st. October 2014



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

Objection number 4 (of four) : **OTHER ISSUES**

Note about TEG-H

The Turbines Evaluation Group – Helensburgh and Lomond (TEG-H) was set up in January 2014 for three reasons. 1. Concern about the nature of information being given to the public about the proposed wind farm above Helensburgh. 2. Need for closer and careful examination of the issues. 3. The prime objective of assessing what would be best for the long-term welfare of Helensburgh and area. Its steering committee is grateful to specialist advisers who have shared expertise and the many people who have assisted in other ways.

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

1. Landscape
2. Visual impact
3. Economic impacts
4. Other aspects

All four provide grounds for refusal. The present objection relates to **other issues**. These are :

- A. Effects on historical and cultural heritage
- B. Effects on natural heritage, especially birds
- C. Public access and recreation
- D. Possible effects on health
- E. TEG-H overview : cumulative impact

A. Effects on historical and cultural heritage

Attention is drawn to the professional assessment of historical and archaeological aspects by Fiona Baker of Firat Archaeological Services Ltd., carried out on behalf of TEG-H. It contains both established and new data. The title is “Assessment of the impact of the Proposed Helensburgh Wind Farm on the Historic Environment” (2014) and has been submitted as an objection.

It points out that the eighteenth century Designed Landscape, remnants of which are clear on the turbines-to-road area of the proposed wind farm, could be “the genesis of the whole town plan of Helensburgh”. The proposed wind farm would not only harm those important remains, but would adversely affect the setting of a historic part of the town which is a designated conservation area and contains significant listed buildings, including Charles Rennie Mackintosh’s Hill House.

Baker’s report, while noting some positive elements of the survey commissioned by the developers, states that this AOC Archaeological survey failed to recognise the full extent of archaeological features on the ground of the proposed wind farm site. It further takes issue with aspects of the developers’ Environmental Statement.

These weaknesses undermine the planning application which is not compatible with Argyll and Bute Council policies STRAT SI 1, item (h), STRAT DC 9, STRAT RE1, LP ENV 11, LP ENV 13(a), LP ENV 14, LP ENV 17LP REN 1; also counterpart policies of the Proposed Local Development Plan. Paragraph 137 of the Scottish Planning Policy (2014) concerns protection of designated and non-designated historic environment and lists associated government sources, while paragraph 169 includes the historic environment as a material consideration in regard to wind farms. The application fails on these criteria.

Paragraphs 135-137 and 140-143, 148 and 151 of the new (2014) Scottish Planning Policy are also relevant to the above.

B. Effects on natural heritage, especially birds

Chapter 3 of the A&BC current (2009) Local Plan is concerned with the environment. Policies LP ENV 2 (biodiversity), 6 (habitats), 7 (trees), and 8 (nature conservation interests) all have relevance to safeguarding the area proposed for the wind farm. Also Policy LP REN 1 – Wind Farms and Wind Turbines provides a list of issues that must be satisfactorily addressed when making wind farm decisions. The second of these reads : “Areas and interests of nature conservation significance including biodiversity, ecology and water environment.”

Scottish Planning Policy (2014) has an extensive section (paras. 193 -205) on valuing the natural environment. Paragraph 193 explains the relationship to the National Planning Framework, stressing that the environment is a valued national asset. Paragraph 194 lists seven reasons for the planning system to protect the natural environment and provides references to key documents.

Regarding birds, attention is drawn to :

- The TEG-H website (<http://www.helturbines.org/bird-life.html>) on bird life in the proposed wind farm area and explains the survey carried out at the request of TEG-H across the seasons of the year. This demonstrates the exceptionally varied range of bird

species in the proposed wind farm area, including five “red status” species that have been observed : Black Grouse, Hen Harrier, Lapwing, Skylark and Cuckoo. Others, such as Short-eared Owl are increasingly rare and of concern. Of these, some are probably nesting in the area. Anecdotally, individuals have reported a diversity of birds including Black Grouse, Hen Harriers and Cuckoo.

- Letter from the RSPB to Argyll and Bute Council dated 28th August 2014 which gave the view that the developers’ Environmental Statement was inadequate, but that other RSPB sources recognised the presence of Hen Harrier, Short-eared Owl and Black Grouse. It praised “the local wildlife importance of this site” and that its proximity to Helensburgh “provides a valuable habitat close to a major town which is of high amenity value”.
- Objection (dated 25th September 2014) from Mr. A. McIntyre referring to data from the RSPB Helensburgh Local Group noting the range of birds in the area, including Black Grouse and Short-eared Owl.
- Objection by Scottish Natural Heritage dated 8th October 2014 which stated “There is insufficient information to establish the nature and scale of impacts on ornithological interests”. That may have prompted the late provision by the developers of 21 bird survey flight path maps dated 10th October 2014, but based on surveys carried out a year and more earlier. Those maps only include eight species, of which six are raptors. These are presumably species that might collide with the turbines. **Hen Harriers** are reported to fly directly into the area proposed for the turbines themselves. However, these maps do not reflect the very wide range of species reported in the TEG-H survey which, as the RSPB letter makes clear, is one of the features that makes this close-to-town site so special.

Conclusion

The ornithological case for refusing this wind farm application and ascribing the area as a Local Nature Conservation Site would seem to be strong.

Regarding bats, the local evidence is less strong, but there is international concern about the harm of turbines to bats, especially at the breeding time.

C. Public access and recreation

Scottish Planning Policy (2014) paragraph 105 states :

“Planning authorities should consider the potential to promote opportunities for tourism and recreation facilities in their development plans.”

Argyll and Bute Council (A&BC) has done so in the current (2009) Local Plan by ensuring that the area upon which the wind farm is proposed is not designated for development. It is part greenbelt, part Sensitive Countryside and part Very Sensitive Countryside, with designated Local Nature Conservation Sites on either side. Policy LP REC 2 concerns safeguarding recreational land and important open spaces. Policy LP COM 1 sub-section (C) deals with the presumption in favour of new or improved “amenity of the surrounding area”, while (D) does so for walking and cycling and (E) calls for these to be close to where people live.

The A&BC Proposed Local Development Plan (PLDP) has gone one step further by proposing to extend the greenbelt northwards and north-eastwards in such a way that if the PLDP becomes adopted, the developers' road ('track') would encroach on the greenbelt and is likely to disturb bird life.

Scottish Planning Policy (2014) states in paragraph 169 that public access and recreation are considerations to be taken into account regarding wind farm applications.

The area identified for the proposed wind farm is the most important part of Helensburgh's setting for access and recreation. Not only does its established network of countryside footpaths, created over the past 20 years, lie to the north of the town, but the Upland Way runs to the south of the planning application area, the 50km Three Lochs Way to the south and west of it and the new cross-Scotland John Muir Way to the east of it.

Helensburgh is by far the largest settlement in Argyll and Bute. It would be difficult to identify a more sensitive area in Argyll and Bute for countryside access and recreation, with linked relevance to tourism (discussed by TEG-H under Economic Impact).

The developers have suggested that their road for construction and maintenance would add to public access, but the area is already well-provided, as explained above.

CONCLUSION

The area proposed for the wind farm is one of the most valued parts of Helensburgh's countryside setting for access and recreation. It is the hub of the town's footpaths network and the junction point for two long distance scenic routes. A worse place for a wind farm from the access and recreation point of view would be hard to imagine. Both national and local planning policies indicate that a wind farm there would be unacceptable.

Note on road traffic

Road traffic impact is likely to be greatest at the construction stage. If movement of large items is done at night time, that would reduce disruption. The extent to which the road proposed from the main road to turbines would cause extra traffic would depend on whether it gets used for other purposes such as transporting cut timber from the forested area close to the proposed turbines.

D. Possible effects on health

Improvement to health through outdoor activity is now accepted internationally. Less well known is emerging evidence that wind farms may damage health of residents near to the turbines. At less than 2km. from the present town boundary, the Helensburgh wind turbines would be close to some. Noise is of greater concern than shadow flicker.

There is some evidence that wind turbines can disturb sleep and therefore harm both physical and psychological health. As so often with fairly newly identified phenomena, more research is needed before firm conclusions can be drawn. A "rapid, desk based analysis" (the researchers' own description) carried out for the Scottish Government in 2009 by Salford University was cautious in its conclusions, but did say that most studies concur that there is evidence of sleep disturbance in the presence of wind farms. The difficulty is identifying cause.

Professor Emeritus Belfast University, Alun Evans, has written (2014) “In conclusion, there are serious adverse effects associated with noise pollution generated by wind turbines. It is essential that separation distances between human habitation and wind turbines are increased.” The issue has recently become a matter of concern in Australia. There does seem to be agreement that there is a problem, even if causes remain uncertain. Research at the University of Munich suggests that exposure to low frequency sound can affect the inner ear.

If we accept the precautionary principle, as is normal in planning, then residents living less than 2km. from Helensburgh’s town boundary could be at risk and that provides an additional reason for refusing this planning application.

E. TEG-H overview : cumulative impact

Cumulative impact is listed as a material consideration. The 2014 Scottish Planning Policy (para. 169) provided a much wider definition of cumulative impact related to wind farms than the previous (2010) SPP.

A striking feature of the Helensburgh wind farm proposal is the multiplicity of planning issues with which it is incompatible. It is not just one or two policies and material considerations that being violated, but so many that it is astonishing to TEG-H that the application is being pursued at all.