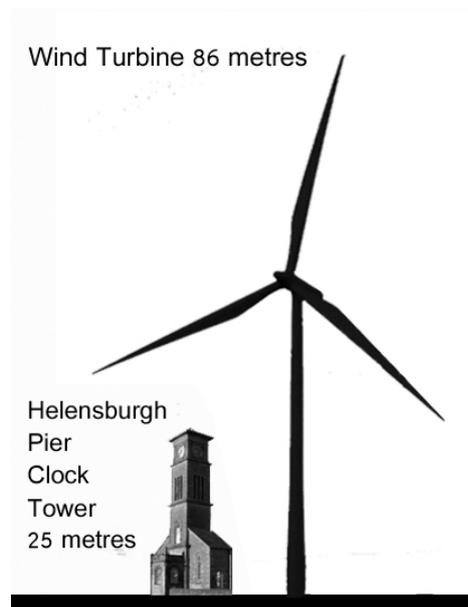


Turbines Evaluation Group – Helensburgh and area

To : Sandra Davies,
Planning Services,
Argyll and Bute Council.
Blairvadach,
Shandon,
Helensburgh, G84 8ND

From : Secretary,
Turbines Evaluation Group,
40 West Montrose Street,
Helensburgh, G84 9PF

Date : 19th. January 2015



Supplementary objection to planning application 14/01674/PP, proposed wind farm north of Helensburgh

EFFECTS ON THE ABOVE APPLICATION OF THE SCOTTISH GOVERNMENT REPORTER'S DECISIONS REGARDING THE ARGYLL AND BUTE COUNCIL'S PROPOSED LOCAL DEVELOPMENT PLAN

The Turbines Evaluation Group – Helensburgh and area (TEG-H) has read the decisions of the Scottish Government reporter concerning the Argyll and Bute Council's Proposed Local Development Plan (PLDP). It has the following observations which reinforce the TEG-H objections submitted previously.

TEG-H recognises that, by the new system, the reporter's decisions are in effect final and that his rulings are therefore now of considerable weight in any planning application. In particular, the reporter has made adjustments to the PLDP in light of the recently released Scottish Planning Policy (SPP) 2014. Although, in earlier objections, TEG-H drew attention to the new SPP, our present objection relates them to the modifications to the PLDP.

Summary. TEG-H notes the reporter's comments about wind farms regarding the Helensburgh area (pages 190-191) and those relating to renewables policy (pages 525-532), as well as linked issues. These add strength to our previous objections by including in the LDP (a) the more restrictive requirements about wind turbines listed in the new SPP, (b) confirming the extension of the green belt and (c) the reporter providing a strong caution about conspicuous wind turbines in the Helensburgh area.

A. Helensburgh and Lomond

1. In item 5 on page 191, the reporter states “I am also satisfied that identifying ‘numerous community led renewable projects ‘ among the means to secure ‘a greener place’, **does not provide support for inappropriately conspicuous wind turbines.**” TEG-H considers that the proposed Helensburgh turbines would be “inappropriately conspicuous” and the fact that this statement was made in the Helensburgh and Lomond section of the report rather than the policy section seems to us to suggest that the statement has special relevance to Helensburgh.

2. In item 3 on page 191, the reporter states “Land within the designated green belt will be afforded greater protection than other areas of countryside and is intended to direct development to more appropriate sites.” The reporter supports the A&BC proposal to extend the green belt northwards, both in parallel to the northern boundary of the town and in a strip to the west of the main road from Helensburgh to Loch Lomond. This will now mean that part of the proposed wind farm area, especially the intended new road across the moorland and the entry point to the wind farm area (but not the turbines themselves), would be in the new green belt. TEG-H suggests that if green belt is to afford “greater protection than other areas of countryside”, as stated by the reporter, then part of the proposed wind farm territory has maximum protection and should not be used for wind farm purposes.

Since the only green belt in Argyll and Bute is in the “Helensburgh corridor”, this reference rightly appears in the Helensburgh and Lomond section of the reporter’s conclusions.

B. Renewables policy

1. In item 9 on page 529, the reporter supports the inclusion of the considerations relevant to wind turbine applications listed in the new Scottish Planning Policy. There are 19 of these and they provide a much stricter set of criteria than were in the previous SPP. They include impacts on communities, economic impact, landscape and visual impacts, effects on natural heritage, public access (including long distance walking routes), historic environment, tourism, and other features. Cumulative impact is redefined as including these. Since they will now be in the new A&BC Local Development Plan they greatly reduce the credibility of the proposed Helensburgh wind farm.

2. In item 13 on page 529, the reporter supports “the council’s strategy to focus on the number and height of the turbines “rather than on electricity generation”. Since height and adverse visual impact are two of the grounds for objecting to the Helensburgh application, that statement adds force to our objections.

3. Since a key part of the reporter’s concerns about onshore wind farms is the need to adapt the PLDP in accordance with the new SPP, it might be appropriate to draw attention to the SPP paragraph 170 which states that decisions on areas suitable for wind farms are not temporary but are “in perpetuity” and to SPP paragraph 174, which the Scottish Government has confirmed to TEG-H is about the potential for subsequent expansion of wind farms, with certain reservations. These two considerations should be factors in refusing the Helensburgh application in our opinion.

C. Conclusion

The reporter’s decisions seem substantially to increase the grounds for refusing the Helensburgh wind farm application.