

Meeting 9 October

Appendix 1 includes the circulated papers for items 5ciii and iv, 5d and 6

Item 5c iii

Rhu and Shandon Community Council

Argyll and Bute Council
Planning Services – Helensburgh and Lomond
Blairvadach
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Fiona Baker
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By email to planning.handl@argyll-bute.gov.uk

18 September 2013

Dear Sirs

Planning Application Ref: 13/01742/PP

Erection of 500KW wind turbine (74m to blade tip). Land East of South Ailey Farm, South Ailey Road, Cove, Helensburgh, G84 0PH

I write on behalf of Rhu and Shandon Community Council to object to the above planning application for a 74m high wind turbine at South Ailey Farm, Cove.

The reasons for the Community Council's objection are as follows:

- The proposed turbine is 74m high and to be located on the 158m contour at almost the highest point at the end of the Rosneath Peninsula. This means the top of the blade would be at 232m above Ordnance Datum. The turbine would be a major visual intrusion in the landscape and seascape.
- The **Supporting Planning Statement, South Ailey Farm Wind Turbine** by Mosscliff Environmental (August 2013) has a number of shortcomings one of which is assessment of visual impact and ZTV (Zones of Theoretical Visibility). The statement has assessed only a 5km radius around the proposed site and three viewpoints. Two viewpoints in close proximity / Kilcreggan and one from Blairmore. There are no viewpoints provided for Helensburgh, Rhu or Shandon. It makes absolutely no mention of the fact that the turbine would be visible from a much wider area and not once is the visual impact for the sea mentioned. The **Planning Statement** states '*the turbine location does not compromise visual amenity*'. We entirely disagree with this statement. The visual impact assessment is inadequate.
- This size of the proposed turbine is in direct contravention of Argyll and Bute Council guidelines contained in the **Argyll and Bute Landscape Wind Energy Capacity Study** (March 2012) (**LWECS**) – a document that is not mentioned once in the **Planning Statement**. A great deal of other wind turbine siting advice is quoted including Argyll and Bute Council Local Plan LP REN 2 and Argyll and Bute Renewable Energy Action Plan but not the Council's own Wind Energy Capacity Study. This is a major shortcoming.
- It is noted that **Argyll and Bute Landscape Wind Energy Capacity Study** (March 2012) is a material consideration in the planning process, according to Argyll and Bute Council's 13/01174/SCOPE document of 22 August 2013.
- The LWECS basically states in its introduction of Main Findings on page 2 that 50m is the maximum height for turbines in this area. '*There is no scope to accommodate turbines above 50m height within the smaller scale settled coastal / loch fringes and islands due to their increased landscape sensitivity to tall turbines.*' The proposal for a 74m high turbine clearly contravenes this advice.
- The LWECS identifies the Rosneath Peninsula as 'Open Ridgeland' and a 74m high turbine is classed as *medium*, just 6m shorter than *large* at 80m. The LWECS states:

*There is some **limited** scope for the small-medium turbines to be accommodated in this landscape. Turbines should be sited away from pronounced hill tops and ridges.....They should be located on lower hill slopes and within natural dips or shelves where rising ground would provide a degree of backdrop able to minimise visual impact.*

The 74m high proposed turbine next to Lindowan Reservoir would be located on top of a pronounced hilltop at a most prominent spot at the end of the Rosneath Peninsula. It is our opinion that this turbine would be a major visual impact to the detriment of the area.

- While the following extracts from the LWECS refer to large turbines over 80m high, considering the proposed turbine is 74m we think it is still relevant to note the following advice:

Visual Amenity – *This landscape is highly visible from many areas around the well-settled Firth of Clyde Basin. All sides of the Rosneath Peninsula are visible from coastal settlement, roads along the Firth and the sea lochs, from Bute and Inverclyde and from boats and ferries within the Firth of Clyde. The low peninsula of Rosneath forms the foreground to the more dramatic 'Steep Ridgeland and Mountains' (1) ...etc. Turbines of this size (large 80m +) would be prominent in views from minor roads and footpaths within the character type. Settlement on the coastal edge of the Rosneath Peninsula would be likely to be less affected due to orientation and screening provided by rising ground. This typology (large 80m +) would be highly prominent from settlement, roads and footpaths and from the sea in the wider Firth of Clyde area and could also impact on views from the Loch Lomond and the Trossachs National Park if visible above the ridge of high ground which forms the boundary to the Park or on the Rosneath Peninsula seen for the Strone Peninsula. Turbines of this size (large 80m +) sited on the Rosneath Peninsulawould intrude on key views to the high peaks of the 'Steep Ridgeland and Mountains' (1) and within the Loch Lomond and Trossachs National Park.*

Landscape Values - *This typology (large 80m +) could also impact on views from parts of the Loch Lomond and The Trossachs National Park particularly if sited on sensitive skylines above the western edge of Loch Lomond or on the Rosneath Peninsula.*

It is abundantly clear from the Council's commissioned study on wind energy development that this planning application should be refused.

In addition to the material considerations contained in the LWECS we wish to note the following points:

- Argyll and Bute Local Plan LP REN 2 states: *'It must be demonstrated that the proposed development will not have an unacceptable adverse impact directly, indirectly or cumulatively on the following criteria –*
 - *sites of historical or archaeological interest or their setting (such as the cord rig and enclosure on the site, Gallow's Hill, Rosneath Designed Landscape)*
 - *settlement character in Conservation Areas (Conservations Areas of Rhu and Helensburgh)*
 - *visual, residential and general amenity*

Also *'Commercial and domestic wind turbines should be the correct size for its proposed location and should fit well with its surroundings'*

- The turbine would be in clear view of LLTTNP and the withdrawn Cove wind turbine development was rejected on these grounds. SNH recommend wind turbines must be at least 10km away from National Scenic Areas, surely LLTTNP is one and the west side of Loch Long, part of the National Park, is 4.1km away.
- The **Planning Statement** itself notes in Section 4.5.1 *'The turbine will be visible form many areas within the study (only 5km radius) due to its height. We believe it will be visible from much further than 5km away. In Section 4.3.5 the Planning Statement notes 'In examining visual effects it is not realistic to ignore public opinion ..'*
- Tourism is a major source of income for Scotland and natural landscapes and beautiful views are a major part of the attraction to visitors. Sailing tourism is particularly relevant to our location. *Visit Scotland* has stated that wind turbines are detrimental to tourism.
- The Aarhus Convention ruling requires applicants to provide up to date anemometer readings to determine the viability of the wind turbine from 'cradle to grave' to determine CO2 savings. There is no anemometer data for the proposal.
- The **Planning Statement** is inadequate in several areas. This is reflected in a number of the statutory consultee responses – e.g. RSPB regarding birds, WOSAS regarding archaeology.
- There is no Environmental Impact Assessment that properly addresses ecological, heritage or hydrology concerns etc and the 'walk-over survey' conducted by Mosscliff Environmental was clearly not undertaken by a person professionally qualified to properly assess all of the issues. We consider it is not appropriate to reach a conclusion in favour of this application on the basis of the information provided in the **Planning Statement** and absence of a proper EIA.
- The **Planning Statement** states *'the site...satisfies relevant local and national planning policies and in particular those relating to: built and cultural heritage...landscape and visual...'*. We do not agree this is the case.
- The **Planning Statement** considers in Section 5.2 that its Heritage Assessment is *'a thorough and detailed analysis of the localised heritage'* and provides *'an accurate and fair representation of surrounding heritage features'*. Professional archaeological advice available to Rhu and Shandon Community Council does not consider this to be the case. The desk study is inadequate (as noted by the West of Scotland Archaeology Service consultation response), the walk-over failed to identify significant prehistoric archaeology and later

rig and furrow agriculture. The **Planning Statement** suggests topsoil disposal on site that would in fact damage the historic environment / archaeological resource. The *Historic Environment (Amendment) (Scotland) Act 2011*, *PAN2/2011 Planning and Archaeology* and *Managing Change in the Historic Environment Guidance Notes* are omitted from Section 5.2 and Designed Gardens and Landscapes are a material consideration.

This development is clearly not acceptable based on the information contained in the **Argyll and Bute Landscape Wind Energy Capacity Study**. Further we are of the opinion that this development would ‘*result in unacceptable harm to the built and rural environment and have a significant detrimental impact on residential, visual and general amenity*’ (**Argyll and Bute Council LP REN 2**) and accordingly it should be refused.

Yours faithfully

Fiona Baker
Rhu and Shandon Community Council

Item 5c iv

To Darrel Hendrie
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cc Neil Drummond
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29th September 2013

Dear Darrel,

Proposed Wind Turbines above Helensburgh

Many thanks for the good wishes of Helensburgh Community Council which were conveyed to us via our member, Jim Duncan, who attended your meeting on Thursday 26th September 2013.

Rhu & Shandon Community Council were interested in hearing the discussion about Item 5 of the HCC meeting, which was described on the agenda as "Update on Windfarm above Helensburgh". Our interest is due to the fact that the proposed site for these turbines is very close to the boundary between our two Community Councils.

We were surprised to hear that the discussion on Thursday night focused on the developers' request for HCC's support for a questionnaire, rather than, as we had expected, the issues raised by the recently published "Scoping Opinion on behalf of A&B Council, Proposed Windfarm consisting of 5 wind turbines on land 3 km North of Helensburgh, Luss, Alexandria".

It appeared to us that the Scoping Opinion raises some serious and fundamental questions about the proposals as they currently stand, particularly with respect to how the requirements of the Argyll & Bute Landscape Wind Energy Capacity Study (LWECS) are not being met. This document is a material consideration in any future planning application. As an adjacent Community Council we have concerns about the impact on our area. For example, the visual impact from recreational areas such as the top of Tom n'Airidh, the Highlandman's Way and the Three Lochs Way, and also the impact on local bird life which overlaps into our council area. We are keen that any studies and montages fully address the visual impact on these key recreational areas.

We would therefore encourage our colleagues on the Helensburgh Community Council to press Helensburgh Community Development Trust, Helensburgh Renewables and the other developers to fully explore and address all the issues raised in the Scoping Opinion and, critically, to include these factors in any information given to the local public and adjacent communities with respect to the proposed wind farm. Public understanding of this information will be essential when and if any questionnaires are issued to the communities.

RSCC have yet to have any formal debate on the wind farm proposals and we have not formed any view on the subject. However, we have decided that our view will not be formed until after we have the views of our community. Obviously we will not seek our community's views until after it is fully informed of all the details of the developer's proposals and in particular the developer's response to A&B Council's Scoping Opinion.

Please do contact us if you feel that we can assist with the discussions.

Yours sincerely

Jean Cook
Secretary, Rhu & Shandon Community Council

Copied by email to:

Members of the Rhu & Shandon Community Council by email
Lomond North Councillors

Item 5d Link to Marine Planning consultations

- **PLANNING SCOTLAND'S SEAS NATIONAL MARINE PLAN CONSULTATION DRAFT**
- **DRAFT SECTORAL MARINE PLANS FOR OFFSHORE WIND, WAVE AND TIDAL ENERGY IN SCOTTISH WATERS**
- **2013 POSSIBLE NATURE CONSERVATION MARINE PROTECTED AREAS CONSULTATION OVERVIEW**

The consultation documents and all associated documents can be found at www.scotland.gov.uk/marineconsultation

Item 6 Licensing

The main document has 31 pages with 2 appendices.

You can view it by following the link below

http://www.argyll-bute.gov.uk/sites/default/files/Argyll%20and%20Bute%20Statement%20of%20Licensing%20Policy%202010_2013.pdf