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13 February 2013

Dear Ms Knox,

12/02695/PP: Planning Application for Wind Turbines on Rosneath Peninsula
Erection of five wind turbines (up to 92.5m high to blade tip) with associated control building, hard standings, underground cabling and construction compound and formation of new access track and upgrading of existing track. Land At Barbour Farm, Knockderry Farm And Clynder Woodland Cove Helensburgh Argyll And Bute

A special open meeting of the Rhu and Shandon Community Council (R&S CC) was held with members of the public on 28 January 2013 to ascertain the views of our community with respect to the recent planning proposal (12/02695/PP) for the erection of 5 wind turbines on the Rosneath Peninsula. Whilst there was some support for the proposal and sympathy expressed for the objectives of the Rosneath Peninsula West Development Trust's objectives, by far the majority present were against the proposals. In line with the views expressed at this meeting R&S CC wish to lodge an objection to the proposed application for the following reasons:

1. Contravention of Argyll & Bute Council (A&BC) policy

The Argyll & Bute Landscape Wind Energy Capacity Study was published in March 2012 and provides a policy for the appropriate location of wind turbines throughout Argyll & Bute. The majority of the Rosneath Peninsula, including the site of the proposed turbines is designated as Landscape Character Type 5: Open Ridgeland, (see p35 and map). This document states:

.... "There is no scope for the larger typologies (*of wind turbines*) to be located within this landscape type without significant impacts on a number of sensitivity criteria. There is some *limited* scope for the small-medium turbines to be accommodated in this landscape."

The larger typology of turbine referred to in this policy are those greater than 80m total height, which is considerably smaller than the 92.5m turbines requested in the application. Small-medium size turbines, for which there is limited scope, would be 30-50m high.

There are several other references within this policy document to the unsuitability of this area and landscape for turbines of the number, size and position selected – the objection letter submitted by Ms Fiona Baker, Hillcroft, Station Rd, Rhu provides an excellent summary of the policy and how it would be contravened by the proposed development.

Thus the proposal is clearly in contravention of Argyll & Bute’s own policy as defined in the Argyll & Bute Landscape Wind Energy Capacity Study, March 2012.

2. Contravention of the Argyll & Bute Local Plan 2009

Policy LP ENV1 of the Argyll & Bute Local Plan 2009 requires that “...the Council will assess applications for planning permission for their impact on the natural, human and built environment, and will resist development proposals which would not take the following considerations into account, namely; (I) ..., Local Nature Conservation Areas...”

In addition **Policy LP ENV8** states that: “Development that would have a significant, adverse effect on Local Nature Conservation Sites or other nature conservation interests, including sites, habitats or species at risk as identified in the Local Biodiversity Action Plan will be refused unless the developer proves: (A) Its public benefits at a local level clearly outweigh the nature conservation value of the site; AND, (B) There is no suitable or available alternative site for the development.”

Given that 4 of the 5 turbines proposed, together with the most of the access roads, fall into a Local Nature Conservation Area, which is a valued habitat for black grouse, and that the developer has failed to demonstrate that the public benefits outweigh the risk to these habitats, ***then clearly the proposal is contrary to policies LP ENV1 and LP ENV8 of the Argyll & Bute Local Plan 2009.*** This point is further reinforced by SEPA who have expressed concerns about the impact on Groundwater Dependent Terrestrial Ecosystems due to groundwater disturbance.

Notes attached to **Policy LP REN2** of the A&B Local Plan 2009 state that: “A development of more than three turbines,, will be assessed against the terms of Policy LP REN 1: Wind Farms”. Thus whether considered commercial or not the proposal under consideration is covered by **LP REN1** which states:

“Wind farm developments will be supported in forms, scales and sites where the technology can operate efficiently, where servicing and access implications are acceptable, and where the proposed development will not have an unacceptable adverse impact directly, indirectly or cumulatively on the economic, social or physical aspects of sustainable development. (A) For all commercial wind farms, regardless of scale, the issues raised by the following must be satisfactorily addressed:

- Communities, settlements and their settings
- Areas and interests of nature conservation significance including local biodiversity, ecology, and the water environment
- Landscape and townscape character, scenic quality and visual and general amenity
- Core paths , rights of way; or other important access routes

- Sites of historic or archaeological interest and their settings
- Telecommunications, transmitting and receiving systems
- Important tourist facilities, attractions or routes
- Stability of peat deposits.”

Clearly,

(a) the second bullet above has not been satisfactorily addressed because of the threats to the Local Nature Conservation Area,

(b) the third bullet has not been satisfactorily addressed because the scenic quality and visual amenity of the landscape is blighted by the proposed development as is discussed below in paragraphs 3 to 5.

(c) the third bullet and the fourth bullet are also contravened by the impact on walking routes, and sailing waters, as discussed in paragraph 6 below.

Thus Policy LP REN1 of the Argyll & Bute Local Plan is contravened in several respects by the proposed development.

3. Siting in Sensitive Countryside

All 5 of the proposed wind turbines, control room and access roads are to be located in Sensitive Countryside. The A&B Local Plan 2009 defines Sensitive Countryside in P/DCZ 5 as areas: “.....with only a limited capacity to absorb development in the open areas of the zone”. The proposed development area is clearly in an open area of Sensitive Countryside and, by definition, has only a limited capacity to absorb development. This reinforces and underlines the findings of the Argyll & Bute Landscape Wind Energy Capacity Study, March 2012, which as described in paragraph 1 above concludes that this site is inappropriate for wind turbines, particularly of the size proposed.

Thus this development is inappropriate for an area of Sensitive Countryside.

4. Visual Impact on the Clyde and the LLTNP

The Environmental Impact Assessment accompanying the subject planning application has a significant section discussing the visual impact of the development. It recognises that the most significant impact will be to the south west, west and north-west, and particularly to users of the Clyde and the Loch Lomond & Trossachs National Park (LLTNP) to the west side of Loch Long. However the developers’ own visual impact studies show that the proposed turbines will be visible from many parts of the LLTNP, eg; as demonstrated in their own map Fig 4.6 of the EIA. (It is our belief that, in line with normal planning policy, Fig 4.7 which shows visibility with trees should be ignored as trees can be felled and removed). The assessment concludes (Vol 1, page 4) that “When evaluating all the relevant issues, it is concluded that the proposed wind farm would have a slight adverse landscape and visual impact on the overall study area, which is considered not significant”.

It is the opinion of the R&S CC that the EIA and this statement substantially understate the impact on those sailing on the Clyde, or using the LLTNP, for whom the proposed development will provide a significant intrusion into what is otherwise a high quality and valued landscape. Sailing on the Clyde, and using the LLTNP, are activities enjoyed not only by a number of our residents, but also by clients of local businesses (eg Rhu Marina, local hotels) who may be deterred from visiting as a result, thus damaging the economy of our community

The visual impact on the Clyde and the LLTNP is significant and is considered to be unacceptable.

5. Visual Impact on Rhu and Shandon

The Environmental Statement, Vol 2 paragraph 4.4.8, 5th and 6th bullet points imply that there is little visibility of the proposed development from Rhu and Shandon. However Fig 4.6 which maps the visibility for a 20km diameter contradicts this in that turbine blades will be visible from parts of the lochside, and almost all parts of Shandon above the 25m contour line. Spot checks by local residents, taking measurements from OS maps, have indicated that 2/3 turbines will be visible from Queens Point and all 5 from the top of Stuckenduff Road, some to the extent of showing 25m of blade. All 5 turbines will be visible from Blairvadach office car park. These checks have also shown that the turbines will be visible from below the central hub (some 40m+ visible to blade tip) from many parts of the popular walk along the Highlandman's Way, as well as from parts of the Three Lochs Way.

Thus we would take issue with the assertion in paragraph 4.5.2 that that the site is effectively screened in all views from the eastern side of the Gare Loch as this clearly understates the situation. In fact the higher parts of Rhu and much of the settlement of Shandon will have a view of some, and possibly all of the turbines which is contrary to the position stated in the Environmental Statement that the visual impact will be minimal.

These effects will be considerably increased should the developer choose to take full advantage of the positioning allowance claimed for micrositing (see Environmental Statement Vol 2 paragraph 2.5.7). If the turbines were moved uphill to the maximum 50m requested then it is estimated that this will add around 7m of elevation and hence make the turbines even more visible across a wider area of the east side of the Gare Loch

Since the development site lies to the west of Rhu and Shandon it is very likely that blade shadows and flicker against a low sun, eg; winter or at sunset, will catch the eye and provide an irritation to the residents of Rhu and Shandon.

Thus, contrary to the Environmental Statement, the visual impact of the development on the residents of Rhu and Shandon is significant and should not be lightly dismissed.

6. Impact on recreational areas

The Rosneath Peninsula is an area enjoyed by many of the residents of Helensburgh, Rhu, Shandon and other loch side settlements for recreation. The B883 along the lochside has several sites, from which views of Loch Long across to Ardentinny can be enjoyed, including a number of picnic sites. The Barbour Road is renowned as a pleasant walk with excellent views to the west side of Loch Long and down the Clyde as far as Arran, and it also provides a scenic drive at a reasonable height for those less mobile. The presence of the proposed turbines near the Barbour Road will severely impact on the enjoyment and amenity that these routes offer and deter many from visiting the peninsula, with consequential loss to its already fragile economy.

There are several walks up on to the peninsula hills which are enjoyed by many visitors and nearby residents alike, and which will all be impacted by the proximity of the proposed turbines. In particular the walk up Clach Mackenny is frequented by many walkers of all abilities and provides a delightful afternoon walk to an unparalleled vantage point from which can be seen the Arrochar Hills, the Loch Lomond Hills, the Gare Loch, vast stretches of the upper Clyde as well as impressive views across and down Loch Long and the Clyde as far as Arran. This unique viewpoint at a relatively modest 202m of elevation will be dominated by the proposed wind turbines which have a total elevation to blade tip of 225.5m, and the nearest of which will be barely 1 km away from the trigonometric point on Clach Mackenny.

The Gare Loch, Loch Long and the Clyde generally are popular sailing waters and these turbines will dominate the skyline from many parts of the area. This adverse visual impact has the potential to discourage visiting sailors who play a large part in the local economies of many of the surrounding small towns and villages.

The proposed development will have an undue and unacceptable impact on the recreational amenity of the area, which is valued by many who live on, nearby and even distant from, the Rosneath Peninsula.

7. Limited Community Benefit

In their submission the developers make many references to the economic benefits which will flow to the Rosneath and Cove communities as a result of this development. Clearly the contribution of any profits to the local Development Trust is the key driver behind the development and the objectives of the trust to improve the facilities for the local community are to be commended, to the point where the community are managing the whole development and not sharing the income with commercial concerns. However, it is clear from the developer's own reports, that there are many communities around the Clyde, Loch Long and the Gare Loch who perceive these turbines as impacting their communities and who stand to reap no benefit whatsoever from the development. Thus the dependence of many of the developers' arguments in favour of overturning A&BC policies (see for example paragraphs 1 and 2 above), or of the acceptability of the impact on others, because of perceived community benefit, is undermined

because the benefits will flow to only a small group who, because of the vagaries of the landscape, will be less impacted than those round about.

Thus, when considered in a wider context, the argument for community benefit justifying this development fails.

8. Efficiency & carbon reduction

The John Muir Trust report (Analysis of UK Wind Power Generation November 2008 to December 2010, by Stuart Young Consulting Ltd, March 2011) indicates that the projected 28% - 30% output of the installation's capacity is unlikely to be met. Wind turbines are not as reliable or efficient in generating electricity as other energy sources. Thus the claims made for carbon reduction by the proposed development are unlikely to be met, whilst the community benefit claimed will be considerably reduced. Also, the carbon footprint of building and installing and then decommissioning the wind turbines is potentially greater than the energy generated / reduction in carbon emissions. Since wind turbine income is largely funded by subsidies (i.e. the taxpayer is paying for it) when one looks at the proposal from a wider community benefit then its value is considerably diminished, if not negated entirely.

The proposal should be rejected as there is evidence to suggest that it will not contribute the carbon savings claimed, or the associated community benefit.

For consideration

The R&S CC believe the above reasons provide sufficient justification for A&B C to reject the proposed application for wind turbines on the Rosneath Peninsula. However, should the Council be minded to approve the application as it stands then we believe that it would be prudent to apply conditions to such approval as follows:

- A. The micro-siting tolerance referred to in the Environmental Statement Vol 2 paragraph 2.5.7 should be restricted to movement along the 130m contour and downhill only. No uphill tolerance and elevation increase should be permitted.
- B. Suitable financial provision (eg a bond with a suitable reputable insurance company) must be made to ensure that there are sufficient funds available to decommission and remove the turbines, and all associated works such as foundations, roadways, cabins and transmission lines, should the development fail financially, fall into disuse, or reach the end of its economic life.
- C. Under no circumstances should expansion of the windfarm be permitted i.e. further turbines should not be approved.

Conclusion

On balance the Rhu and Shandon Community Council do not believe that a case has been made for overturning Argyll & Bute Council policies, imposing visual intrusion on adjacent communities, the LLTNP, and local recreation areas, and accepting environmental damage to a Local Nature Conservation site, so object to the proposed development.

Yours sincerely

Jack Rudram
Convenor, Rhu & Shandon Community Council

Copied to:

Members of the Rhu & Shandon Community Council by email
Councillor George Freeman by email
Councillor Robert Macintyre by email
Councillor Maurice Corrie by email