

PLANNING AND ACCESS COMMITTEE

MEETING: NPA/PC/06/2014/05

DATE: 29/09/2014

REPORT No.	NPA/PC/06/2014/05
SUBMITTED BY:	Executive Director of Planning
APPLICATION NUMBER	14/01674/PP (Consultation by Argyll and Bute Council)
APPLICANT:	Green Cat Renewables Ltd
LOCATION:	Land To South East Of Tom Na H Airidh And North Of Drumfad Wood, Approximately 2km North Of Helensburgh Argyll And Bute
PROPOSAL:	Erection of five 800kW wind turbines (86.5 metres high to blade tip), formation of new vehicular access, crane hardstandings and erection of substation and temporary works compound.

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1 SUMMARY AND REASON FOR PRESENTATION

- 1.1 This application is being reported to Committee as it relates to a consultation by a neighbouring authority for a development accompanied by an Environmental Impact Assessment (EIA).
- 1.2 The proposal is for the erection of a windfarm consisting of five wind turbines which are 86.5 metres in height to the blade tip, formation of new vehicular access, crane hardstandings and erection of substation and temporary works compound. The application site is located to the North of Helensburgh outwith the National Park. Argyll and Bute Council is the determining planning authority. The nearest turbine is proposed to be 112.5m from the National Park boundary.

2 RECOMMENDATION

<p>That Members:</p> <p>Object to the planning application for the following reasons:</p> <ul style="list-style-type: none"> 1. The proposed development will have a significant adverse impact on landscape setting in South Loch Lomond and the visitor experience and; 2. The proposed development will have a significant adverse impact on landscape setting at Glen Fruin.
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3 BACKGROUND:

Site Description

- 3.1 The proposed development is located on agricultural land approximately 2km North of Helensburgh. The site is situated on the South Eastern side of Tom na h-Airdh at an elevation of 240m to 287m. The nearest turbine of the proposed development is approximately 112.5m from the Park boundary. The nearest settlements in the National Park are Balloch (9km), Kilmun, Strone and Blairmore (11km), Gartocharn (13km) and Croftamie and Drymen (18km).

The access point to the site will be a new access track which joins the A818 Luss road. In total 4km of new access tracks will be created to support this development. The site has a gently undulating topography and is mainly covered by open Ridgeland Landscape Character Type. This is identified as a linear landscape which runs behind Helensburgh and along the edges of the Clyde and Gareloch, continuing down into the Rosneath Peninsula. The site is currently used for agricultural purposes.

Description of Proposal

- 3.2 The proposal is for five wind turbines with a maximum tip height of 86.5m. The development is being proposed by a partnership of three parties, Luss estates, Green Cat Renewables Ltd and Helensburgh Community Development Trust (HCDT). The applicant is also proposing to provide community benefits in the form offering a third of the income from the development ministered via the HCDT.

Context with Other Windfarm Proposals

- 3.3 *Merkins windfarm* - In October 2012 the National Park officers report recommended that the Planning and Access committee object to the application to West Dunbartonshire Council for Merkins windfarm as it would have a **significant adverse impact** on the landscape setting and character of Loch Lomond south and would introduce a negative change to the baseline landscape character type (Rugged Moorland) by introducing large wind turbines i.e. a man-made element to the landscape. This application was refused in 2013.

Cove Community Windfarm - In March 2013 the Planning and Access committee concluded after assessing the information provided that the development would have a **significant adverse impact** on the landscape setting and character and took into consideration several factors including the visual impact from Ardentiny beach. This development proposal has now been withdrawn.

Proximity of Windfarms to Park Boundary

It should be noted that Merkins windfarm comprised of ten turbines at a height of 120m from hub to blade tip height and the nearest turbine was 2.5km from the Park Boundary. Cove Windfarm from the east was approximately 6kms from the National Park Boundary at the upper slopes of Glen Fruin.

Helensburgh Windfarm is 112.5m from the National Park Boundary and approximately 400m from the Three Loch Way within the National Park. It is 1.4km from the minor road referred to as the A818 in the ES which offers open views of the farmland and ridgeline which encloses Glen Fruin.

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Summary of Supporting Information (submitted to Argyll and Bute council)

3.4 Environmental Statement:

An Environmental Statement prepared by Green Cat Renewables Ltd was submitted with the application.

The Landscape and Visual Impact Assessment (LVIA) is part of the Environmental Statement. This document sets out the potential landscape and visual impacts arising from the proposed windfarm. It presents an analysis of the impact the proposed windfarm will have on the character of the different landscape types and designated areas within a 30km radius of the site. It also sets out an analysis of the visual impact of the proposed development in relation to important viewpoints and routes. This presents an indication of the potential impact of the windfarm on visitor experience and residential amenity.

The LVIA includes a figure showing the Zone of Theoretical Visibility (ZTV) (included as Appendix 2). This shows the extent of theoretical visibility of the wind turbines and takes account of relief and topography, but not of trees, buildings and other land cover. As such, the ZTV can be considered to present a 'worst case scenario' as views of wind turbines can be wholly or partially obscured by vegetation or buildings.

The LVIA and the ZTV along with officers own assessment are the elements most drawn upon when reviewing the merits of this proposal in relation to the National Park.

4 POLICY CONTEXT

4.1 National Policy:

Scottish Government has set a target of 100% of all electricity demand in Scotland to be produced by renewable sources in 2020. Both Scottish Planning Policy (SPP) and the National Planning Framework 3 have a supportive stance towards renewable energy development. National Planning Framework 3 recognises the contribution that on shore windfarms has and will continue to contribute to meeting Scotland's electricity demand. However, any energy generation should safeguard the environment and communities.

The Scottish Government accepts that opportunities for energy developments in National Parks are limited to those which will not conflict with their primary aim of environmental conservation by adversely impacting on their special qualities, including their visually sensitive landscapes. SPP (published June 2014) paragraph 212 states that any development which affects a National Park should only be permitted if the objectives of designation and the overall integrity of the area will not be compromised or any significant adverse affects of the effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

The National Parks however, can offer opportunities for small scale renewable energy schemes, especially small scale hydro and biomass. This is already being promoted as of April 2014, many small hydro power schemes were already operational within the National Park, the total capacity of these schemes calculate to over 155.5MW.

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4.1 Statutory Aims

All development proposals affecting the National Park will need to contribute to the four Statutory Aims for National Parks in Scotland. They are:

1. To conserve and enhance the natural and cultural heritage of the area;
2. To promote sustainable use of the natural resources of the area;
3. To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public, and;
4. To promote sustainable economic and social development of the area's communities.

While the Partnership Plan and Adopted Local Plan all concern the management and development of the National Park, they are also of relevance in considering proposals which may affect the National Park and its special qualities. A consultation response for activities outside but near the Park will need to have regard to these four statutory aims and plans and policies for the National Park. Indeed, Section 14 of the National Parks (Scotland) 2000 Act includes a duty on public bodies exercising functions affecting the National Park to have regard to National Park Plans. The Local Plan includes a specific policy in respect of renewable energy proposals adjacent to the Park. Relevant policies are therefore outlined below.

4.2 National Park Partnership Plan (Approved June 2012)

The National Park Partnership Plan (2012 – 2017) presents the most up to date position of the Park Authority, and the proposal is assessed against the following:

Con Policy 3: Landscapes

This policy sets out that all landscapes and special qualities of the Park should be protected. It specifies that the relative wildness of the National Park and especially the core areas of wild land should be protected.

RD Policy 5: Renewable Energy.

This policy provides a clear steer towards the Park's approach for the generation of renewable energy, stating, "The National Park will contribute towards the delivery of the Government's targets for renewable energy generation. Large scale commercial wind turbines are incompatible with the special qualities of the National Park and are not considered to be appropriate within the National Park or where outside the Park they affect its landscape setting." The definition of large scale for the purpose of this policy is more than one turbine and over 30m in height.

4.3 Adopted Local Plan 2010 – 2015

REN5: Renewable Energy Development Adjacent to the National Park Boundary.

This policy sets out the criteria used by the NPA in the assessment of the qualities of a scheme outside the Park's boundaries. It states – amongst others - that development adjacent to the Park should not have an adverse visual impact on the landscape setting of the Park and its principal gateways.

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5.0 PLANNING ASSESSMENT

5.1 *Designations: Loch Lomond and the Trossachs National Park*

The LVIA sets out that the magnitude of change will be greatest in views from areas closest to the windfarm. This will decrease with distance, and the windfarm will not be visible from large areas towards the north of the Park. Even though there are some clear significant adverse visual impacts on areas closer to the windfarm, the applicant judges the impact of the proposed development on the visual amenity for the Park as a whole as of minor significance, stating that it would not alter the character of the Park and is typically visible in its most developed sections. Officers do not agree with this assessment.

As such, the National Park Authority does not agree the impact of the proposed development on the National Park to be of *minor* significance. The proposal will result in a *significant adverse change to visual amenity*. This is explained below.

Landscape Considerations

5.2 Landscape Character Assessment is the key tool for understanding the landscape and is the starting point for baseline surveys. Landscape Character Type (LCT) defines what is unique about an area. This takes into account existing landforms, field patterns, tree cover, settlements etc. Each potential impact on landscape character must be taken into consideration in order to assess the magnitude of change that could occur.

5.3 The windfarm is in an area classified as ***open ridgeland*** within the Landscape Character Assessment for Argyll and Firth (link in appendix Appendix). This LCT covers the band of hills behind Helensburgh and Cardross below the ridge that forms the boundary to the Loch Lomond and Trossachs National Park. It is a landscape comprising of gentle hill slopes and smooth ridges with a simple land cover pattern of semi-improved grazing moorland and coniferous plantations. This landscape lies adjacent to the LCT of Open Moorland (as classified in the Loch Lomond and Trossachs Landscape Character Assessment 2002 (link in appendix). This is characterised by open expanses of land with occasional fences access tracks and minor roads. The pylon line at a height of approximately 45m across this landscape is partially backclothed from the minor road through Glen Fruin by Tom na h-Airidh from a height of 150m Above Ordnance Data becoming part of the skyline on this ridge (Appendix 4). However the turbines at 86.5m will dominate the skyline on this ridge dominating views across Glen Fruin and from Glen Fruin with views from the East.

Impact on Special Qualities

5.4 The Special Landscape Qualities of Loch Lomond and Trossachs National Park Report 2010 commissioned by SNH (link to document below) defines special qualities as the characteristics that, individually or combined, give rise to an area's outstanding scenery.

The general special qualities which apply to the entire park include:-

- A world renowned landscape famed for its natural beauty;
- Tranquillity
- Famous through routes and
- The easily accessible landscape splendour.

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Viewpoint analysis submitted as part of the Environmental Statement shows that there will be visibility from Viewpoint 1 (Appendix 3) on the A817 which runs along Glen Fruin allowing views across the moorland to Tom na h-Airidh. The turbines will be visible on the summit of this ridge and there will be sequential views of the windfarm. The photomontage shows the turbines from a distance of 1.7km away dominating the skyline on the hills eastern edge.

Viewpoint 15 (Appendix 4 – Glen Fruin) is more southerly on the minor road through Glen Fruin accessed from the roundabout at Arden and equally the turbines dominates the ridge line of Tom na h-Airidh. Electricity pylons are also visual but at a smaller height and scale. There would be visibility from the Arden roundabout showing the blade tips of the turbines.

Specific special landscape qualities that apply to Loch Lomond are :-

- Immensity of loch and landscape
- A multitude of beautiful islands
- Distinctive mountain groups
- Peaceful side glens

Visitors to eastern Inchmurrin would be able to see all five turbines on the horizontal landscape and recreational users of the loch itself would view the windfarm above the horizon to the west of the loch once leaving the slipway. The designed landscape of Balloch Castle would have views of the turbines within a landscape which offers the undisturbed views of Glen Fruin, Glen Douglas and Glen Luss across Loch Lomond. The location of viewpoint 15 (Appendix 5) for Boturich Castle is along the access road to this location. The magnitude of change is stated in the Environmental Statement (ES) as low with a moderate magnitude of change which is not considered significant in the ES. However the National Park Authority consider that there would be an impact on visitor experience within this designed landscape and that it *would* be of significant impact on the landscape.

The ZTV and illustrations of field of view for Loch Lomond ferry users show that the turbines would be evident on the hillside which would be a dominating view from the ferry due to the immediate hills forming a core visual aspect of the landscape experience due to the prominence of the open ridgeland.

Duncryne Hill (Viewpoint 16 - Appendix 6) at Gartocharn provides views across the Highland Boundary Fault and the islands of Loch Lomond. Due to the open aspect of the landscape it would be possible to see all five turbines. The LLTNPA Special Landscape Qualities describes Duncryne as offering *“truly a panoramic classic view of highland/lowland landscapes and a well-known beauty spot”*.

Long Distance routes and Access tracks

- 5.5 The West Highland Way route travels through Garadhban Forest where there are sequential views across Loch Lomond and the Highland Boundary Fault to the open moorland, open and forested hills to the ridges of Glen Fruin, Glen Luss and Glen Douglas. The view of the turbines would be discernible at open areas along the Southern parts of West Highland Way. Five turbines would be visible from Conic Hill but at a distance of 15.1km the visual impact would not be significant.

The Three Lochs Way entering the National Park at Glen Fruin is less than 500m from the nearest turbine on the east. Views would be constant entering the Glen to the minor road from the A818.

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The A818 is less than 150m from the nearest turbine and the turbines would be skylines on Tom na h-Airidh. There would be a significant adverse impact on this landscape setting.

5.6 Economic Impact

Tourism is an important element in the economy of the National Park. The area is visited on an annual basis by 7 million visitors, and the sector has a total annual revenue of £206 million.

The location of the windfarm is on a setting which currently is not significantly affected by man-made structures of this scale and type. Loch Lomond itself is highly valued by recreational water users, including passengers on the waterbus, ferries and various cruises across the Loch. At present, there are 5,000 registered boat users on the Loch. In addition, water transport on the Loch has proved very popular with operators adding 2 additional routes in 2013-2014.

In 2011 Visit Scotland commissioned research into the attitudes of tourists towards wind farms and their effects on tourism. Results show that the landscape and scenery were important reasons for UK (86%) and Scottish (91%) responders to visit the country. Following on from this, 20% of UK and 17% of Scottish respondents claimed that the presence of a windfarm would affect their decision about whether or not to visit an area.

Concerns also exist for other businesses which would be affected by a significant adverse affect on the landscape. Boturich Castle (Appendix 5 – Viewpoint 10) is a popular wedding venue and utilises the special landscape qualities on Loch Lomond with its loch shore fringe and views across the loch.

Map 3 on p43 of the Adopted Local Plan shows areas of intense and moderate tourism activity. The map presents an indication of the main areas of tourism activity within the Park. The entire South Loch Lomond area, including the settlements of Balmaha, Drymen, Balloch and Luss, is considered to be an area of either intense or moderate tourism activity.

6 **CONCLUSION**

The area around the southern part of Loch Lomond is yet to be affected by the development of windfarms along the boundaries of the National Park. This proposal would introduce a windfarm at a very short distance (112.5m) in an area that currently is not significantly affected by man-made infrastructure of this scale and type. It will have a significant adverse visual impact on the landscape setting of the Park and its special qualities. This is considered to be the same level of impact as the Merkins Windfarm due to its proximity and location even though it is of less scale.

The proposed development will also have a significant adverse impact on iconic views from within the Park outwards along sections of the West Highland Way and along the three Lochs Way. Concerns also exist regarding the visual impact across southern Loch Lomond, notably Inchmurrin and ferry users leaving from Arden (Appendix 7 shows this impact).

In conclusion, the proposal is considered contrary to policy REN5 'Renewable Energy Development Adjacent to the National Park Boundary' of the Adopted Local Plan.

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The proposal is also considered contrary to policies CON policy 3 'Landscapes' and RD policy 5 'Renewable Energy' of the National Park Partnership Plan. The proposal is also considered to be contrary to Scottish Planning Policy paragraphs 85, 212 and 213. Officers recommend that members object to the proposal.

List of Appendices:

Appendix 1:

Site Location Plan

Appendix 2:

Zone of Theoretical Visibility (ZTV) to Tip Height (Scale 1:250,000)

Appendix 3:

Viewpoint 1 - A817 Loch Lomond

Appendix 4:

Viewpoint 15 – Glen Fruin

Appendix 5:

Viewpoint 10 - Boturich Castle

Appendix 6:

Viewpoint 16 - Duncryne Hill

Appendix 7:

Loch Lomond Ferry Visibility Map

Nb. All Appendices are taken from the Environmental Statement of the applicant.

Links to Documents

National Park Partnership Plan 2012-2017

http://www.lochlomond-trossachs.org/images/stories/Looking%20After/PDF/NP%20Plan/NPPPlan2012_final3.pdf

National Park Adopted Local Plan 2010-2015

<http://www.lochlomond-trossachs.org/planning/adopted-local-plan-2010-2015/menu-id-904.html>

Landscape Character Assessment for Argyll and Firth of Clyde, Scottish Natural Heritage, 1996 <http://www.snh.org.uk/publications/on-line/LCA/argyll.pdf>

to Loch Lomond and Trossach Landscape Character Assessment, Scottish Natural Heritage, 2002 <http://www.snh.org.uk/publications/on-line/LCA/lltca.pdf>

The Special Landscape Qualities of Loch Lomond and Trossachs National Park Report, SNH and LLTNPA, 2010

http://www.snh.org.uk/pdfs/publications/commissioned_reports/376.pdf