

RHU & SHANDON COMMUNITY COUNCIL

**Major Applications Unit
Planning and Regulatory Services,
Whitegates Office,
Whitegates Road
Lochgilphead,
PA31 8SY**

Please reply to:

**Jean Cook, Secretary
Rhu & Shandon Community Council
Inverallt
Shandon
Helensburgh
G84 8NR**

By email to

planning.handkl@argyll-bute.gov.uk

Sandra.Davies@argyll-bute.gov.uk

Telephone enquiries:

**01436 820906
07901 515208**

29 September 2014

Jack.Rudram@btopenworld.com

Dear Ms Davies,

**Planning Application Ref: 14/01674/PP
Erection of 5 x 800kW wind turbines on Tom na h-Airidh**

I write on behalf of Rhu and Shandon Community Council (R&SCC) with regard to the above planning application for the development of five wind turbines (86.5m to blade tip, hub at 60m and rotor diameter of 53m) on the south facing slope of Tom na h-Airidh just under 2km above (north of) Helensburgh. The proposed development site (at c. NS 295 856) lies within the Rhu and Shandon Community Council boundary.

The attached paper describes the position of R&SCC with respect to this application and concludes that R&SCC object to its approval.

Yours sincerely,

Jack Rudram, Convenor
For Rhu & Shandon Community Council

RHU & SHANDON COMMUNITY COUNCIL

Planning Application Ref: 14/01674/PP Erection of 5 x 800kW wind turbines on Tom na h-Airidh

Submission by Rhu & Shandon Community Council

1 Summary

This submission has been prepared on behalf of Rhu and Shandon Community Council (R&SCC) with regard to the above planning application for the development of five wind turbines (86.5m to blade tip, hub at 60m and rotor diameter of 53m) on the south facing slope of Tom na h-Airidh just under 2km above (north of) Helensburgh. The proposed development site (at c. NS 295 856) lies within the Rhu and Shandon Community Council boundary.

This paper provides the full detailed submission of R&SCC on this application.

R&SCC arranged to have a survey form delivered to every household in Rhu and Shandon seeking the community opinion (of over 18 years of age) on the proposed wind farm. The survey has produced the following result:

Support for the wind farm proposal:	11%
Opposed to the wind farm proposal:	89%
Total number of validated responses:	175

Where a comment was added to the survey form returns ‘visual impact’ was the most frequent reason for objecting to the proposed development.

Accordingly R&SCC, reflecting the views obtained, are registering an objection to the application for the following reasons:

1. The height of the proposed turbines – at 86.5m these exceed the recommended height for this location
2. The siting of turbines on an open ridge, and of switch-houses beside core paths, and access roads traversing open hillside creates an adverse visual impact when viewed from:
 - i. core paths including the iconic John Muir Way, the Three Lochs Way and the West Highland Way
 - ii. busy access routes in the immediate local area including the A814, A817, A818 and the B832
 - iii. many vantage points from all around the Clyde estuary
 - iv. the top of Tom na h-Airidh

RHU & SHANDON COMMUNITY COUNCIL

3. The development would be a significant visual intrusion into the sensitive countryside setting of Rhu and Helensburgh and would have a detrimental effect on recreation and tourism.
4. The proximity of the site to the Loch Lomond and The Trossachs National Park.

In these and other respects application 14/01674/PP contravenes the following policies and material considerations in the planning process:

- a) Scottish Planning Policy (SPP) 2014 - paragraph 169.
- b) Argyll & Bute Local Plan (August 2009), (*the current local development plan*): policies LP REN1, LP REN2, and also the associated Windfarm Policy Map
- c) Argyll & Bute Local Development Plan (Feb 2013), (*the proposed local development plan*): policies SG LDP REN1, SG LDP TOUR2, LDP 3, LDP 6, LDP 9, LDP ENV 1,8,14 & 15
- d) Argyll and Bute Landscape Wind Energy Capacity Study (March 2012)
- e) The Argyll and Bute Council Green Belt Landscape Study by Ironside Farrar (Feb 2010)

In addition to the reasons given here R&SCC is concerned that paragraphs 170 and 174 of SPP 2014 (ref a above) describe such designation of an area for wind turbine development as being *in perpetuity* with consequent potential for extension or enhancement.

It is a disappointment and concern that the planning advice given by Argyll and Bute Council in the Scoping Opinion to the developers, along with input from most consultees, appears to have been entirely ignored and disregarded by the applicants. The Scoping Opinion largely supports R&SCC grounds for objection to the application as summarised above. (*Argyll and Bute Council Scoping Opinion Request for a Proposed Wind Farm consisting of 5 wind turbines on land 2km N of Helensburgh, Argyll and Bute. Ref. 13/01174/SCOPE dated 22 August 2013*).

2 Summary Conclusion

The R&SCC survey confirms that this development is clearly not acceptable to the community of Rhu & Shandon. Nor is it acceptable based on Argyll and Bute Council policies. R&SCC, reflecting the views of the community it represents, are accordingly of the view that this application should be refused.

RHU & SHANDON COMMUNITY COUNCIL

3 Scoping Opinion

Argyll and Bute Council provided the developer Green Cat Renewables (Developers - Green Cat Renewables / Luss Estates / Helensburgh Community Development Trust) with advice that confirms all of our grounds for objection to the development in the Argyll and Bute Council Scoping Opinion Request for a Proposed Wind Farm consisting of 5 wind turbines on land 2km N of Helensburgh, Argyll and Bute. Ref. 13/01174/SCOPE dated 22 August 2013 and prepared by Arlene Knox, Senior Planning Officer, Development and Infrastructure, Major Applications Team. We also note that this Scoping Opinion incorporated the views of a wide range of consultees with only BAA not having provided a response at the time.

The Scoping Opinion clearly states: *‘The scale of the proposal (especially in terms of turbine height) is unlikely to be appropriate for this location and may result in very significant adverse landscape and visual impacts. A significant reduction in the scale of the proposal is recommended, informed by the findings of the Argyll and Bute Landscape Wind Energy Capacity Study (LWECS)...’*

The Scoping Opinion also states the following:

‘in.... terms of the Council’s ‘Argyll and Bute Local Plan’ (adopted 2009) wind farm development will only be supported in forms, scales and sites wherethe proposal will not have an unacceptable adverse impact directly or indirectly or cumulatively on the economic, social or physical aspects of sustainable development’

The proposal is not supported by the development recommendations cited in the LWECS.

We are disappointed and concerned that the planning advice given in the **Scoping Opinion** of August 2013 appears to have been entirely ignored and disregarded by the applicant. The height and location of the development has not been altered from the proposal commented on by the Scoping Opinion. It is our community’s opinion that these turbines would be a major visual impact to the detriment of the local and wider Clyde estuary area.

4 Height of Turbines, situation on an open ridge and setting

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) – *see summary reference (d)*.

The LWECS basically states in its introduction of Main Findings on page 2 that 50m is the **maximum** height for turbines in landscape designated as *Open Ridgeland* (LWECS Main Study Part 2, Character Type 5). *‘There is no scope to accommodate turbines above 50m height There is some **limited** scope for the small-medium (<50m) turbines to be accommodated in this landscape. Turbines should be sited away from pronounced hill tops and ridges.....They should*

RHU & SHANDON COMMUNITY COUNCIL

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 proposed location for the five 86.5m high turbines clearly contravenes this guidance. There is no scope for five *large* (>80m) turbines at the proposed location.

LWECS Landscape Values - *This typology (large >80m turbines) 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 ... The turbines would be in clear view of LLTTNP. SNH recommend wind turbines must be at least 10km away from National Scenic Areas (see proposed Local Development Plan (ref c) SG LDP ENV 12 Development impact on National Scenic Areas), The Loch Lomond Scenic Area is only 2km away and the boundary of the National Park is only c. 200m away.*

LWECS Visual Amenity – *This landscape is highly visible from many areas around the well-settled Firth of Clyde Basin. Turbines of this size (large >80m) would be prominent in views from minor roads and footpaths within the character type. 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.....*

5 Setting of Rhu and Helensburgh

Much of the attraction of Rhu and Helensburgh comes for their setting on the banks of the Clyde with open ridges and moorland above. Whilst the proposed turbine site appears not to be within the Greenbelt it is in ‘*Sensitive Countryside*’, possibly extending into “*Very Sensitive Countryside*”. The importance of the ridge land behind the town and Tom na h-Airidh is discussed in the Green Belt Landscape Study by Ironside Farrar (ref e). For example in paragraph 2.5 it says, ‘*The twin peaks of Ben Bouie to the east and Tom na h-Airidh in the west form the broader setting to the town and a backdrop of open moorland and forestry.....The town lies below a distinctive ridge line...with the landscape character above the town an abrupt transition to a relatively wild and open landscape, comprising raised bogs, conifer wood and regenerating birch woodland*’. Clearly large turbines and access roads would intrude and destroy the overall setting of the town and villages.

Helensburgh is not designated as an Area of Panoramic Quality by Argyll and Bute but it is clear to all that the Clyde Estuary is a panoramic area. Argyll and Bute Council Scoping Opinion (see above) identifies as constraints to the development ‘*The importance of this landscape in terms of the contrast it provides with the more developed coastal areas of Inverclyde, North Ayrshire and the urban area of Glasgow*’ and further ‘*The high visual prominence of the Open Ridgeland in views from roads, recreational areas and wider settlement in the Firth of Clyde area*’.

RHU & SHANDON COMMUNITY COUNCIL

6 Other Relevant Policies and Considerations

In addition to the material considerations contained in the LWECS and advice given to the applicant in Argyll and Bute Council's Scoping Opinion we wish to note the following points:

Argyll and Bute proposed Local Plan SG LDP REN 1 (*see ref c*)

Windfarm developments will be supported.....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.

- *Communities, settlements and their settings*
- *Landscape and townscape character, scenic quality and visual and general amenity*
 - Conservations Areas of Helensburgh and to a lesser extent Rhu. Hill House is a major tourist attraction in Helensburgh and thereby the whole district, its settlement character and setting would be severely compromised by this development. (See SG LDP ENV 17 – ref c).
 - The proposed development site has Clyde Estuary wide views. West Dunbartonshire Council expressed concern at the scoping stage of the visual impact on the Kilpatrick Hills.
- *Core paths, rights of way; or other important access routes*
 - The Three Loch's Way, John Muir Way and Highlandman's Road are core paths and well used by local walkers. Tom na h-Airidh is a popular local walk destination and hilltop viewpoint. Not only would walkers be passing virtually underneath the turbines, the proposed access roads cross and parallel the walking routes. In addition the visual impact on National Cycle Routes and cycle paths (e.g. through Glen Fruin alongside the B832 must also be considered).
- *Sites of historic or archaeological interest or their setting*
 - such as the newly recognised and significant early 18th century Designed Landscape in which the windfarm will be sited. (SG LDP ENV 15 and SG LDP ENV 20 of ref c should be considered with relation to this)
 - the proposed grid connection to the substation at Woodend would cross extensive WW II remains but this is not noted in the submitted ES.
- *Important tourist facilities, attractions or routes*
 - 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 and walking tourism is set to increase with the Three Lochs and John Muir Way routes. *Visit Scotland* has stated that wind turbines are detrimental to tourism.

R&SCC believe the cumulative impact would be to the detriment of our community.

Argyll and Bute Policy proposed in ref c as **LDP 3 Supporting the Protection, Conservation and Enhancement of our Environment** states:

RHU & SHANDON COMMUNITY COUNCIL

A development will not be supported when it:

- (A) *Does not protect, conserve or where possible enhance biodiversity, geo-diversity, soils and peat, woodland, green networks, wild land....*
- (B) *Does not protect, conserve or where possible enhance the established character and local distinctiveness of the landscape...in terms of its location, scale, form and design.*
- (C) *Does not protect, conserve or where possible enhance the established character of the built environment in terms of its location, scale, form and design*
- (D) *Has a significant adverse effect, including cumulative effect, on the special qualities or integrity of designated natural and built environment sites*

Argyll and Bute Policy proposed in ref c as **LDP 9 Development Setting, Layout and Design** states:

Development Setting

- (A) *Development shall be sited and positioned so as to pay regard to the context within which it is located.*

Points (B) and (C) are equally relevant and while this policy is mostly concerned with housing we would draw attention to 5.7.3 Development Setting...*'It is important when assessing the impact of the development setting to focus on the regional and local characteristics of the landscape....'*

Argyll and Bute Policy proposed in ref c as **SG LDP ENV 14 Landscape** states:

Argyll and Bute Council will consider landscape impact when assessing development proposals, and will resist development when its scale, location or design will have a significant adverse impact on the character of the landscape...

Argyll and Bute Council's **Proposed Local Development Plan Written Statement** (February 2013 – ref c) states that by 2024 *'Helensburgh and Lomond will be a place of outstanding natural and built heritage'* (2.3.2, p10). Key Objective A (1.7, p5) of 'The Vision' expressed in the PLDP is *'To make Argyll and Bute's main towns and key settlements increasingly attractive places where people want to live, work and invest'*. The proposed development would not contribute to either of these objectives.

This **PLDP Written Statement** (ref c) also very clearly states under **Policy LDP STRAT 1 – Sustainable Development** (p7) that the Council shall adhere to sustainable development principles including:

- g) Avoid the loss of important recreational and amenity open space.*
- h) Conserve the natural and built environment and avoid significant adverse impacts on biodiversity, natural and built heritage resources.*
- i) Respect the landscape character of an area and the setting and character of settlements.*

We also note that the Helensburgh Reservoirs are identified in the current Local Plan (ref b) and in the proposed **LDP** (ref c) as an Area for Action (AFA 3/9) for *'enhancement / redevelopment*

RHU & SHANDON COMMUNITY COUNCIL

of redundant reservoirs'. Massive wind turbines on the adjacent hillside would not enhance them in any way.

It is also a stated objective of Argyll and Bute Council (see proposed **LDP Written Statement**, p45, 5.1 and 5.2) to strengthen communities by ensuring active healthy people with better recreational and leisure opportunities and improving green networks. Highlandman's Road, The John Muir Way and Three Loch's Way are all key in attaining this outcome, as is maintaining local walking routes on Tom na h-Airidh.

7 Conclusion

The R&SCC survey confirms that this development is clearly not acceptable to the community of Rhu & Shandon. Nor is it acceptable based on the information contained in the Argyll and Bute Landscape Wind Energy Capacity Study – ref d. As is demonstrated above the proposal also contravenes many aspects of Argyll & Bute Council's own planning policies as laid down in the key references. R&SCC, reflecting the views of the community, is 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 – ref b) and accordingly the planning application should be refused.

Jack Rudram
Convenor, for Rhu and Shandon Community Council
29 September 2014