

Local Review Body

6 November 2013

Planning Application for Review

Mr G Dunlop

**Erection of two 67m high to blade tip wind turbines:
Priestside Farm, Auchentiber Road, Kilmacolm (13/0036/IC)**

Contents

- Planning Application and plans
- Site photographs
- Report of Handling dated 18 April 2013
- Consultation Responses
- Representations
- Decision Notice dated 23 April 2013
- Letter dated 16 July 2013 from Bryce Boyd Planning Solutions enclosing Notice of Review form together with supporting documents
- Suggested conditions should planning permission be granted on review

PLANNING APPLICATION AND PLANS

Head of Planning and Housing
Cathcart House
6 Cathcart Square
Greenock PA15 1LS

FOR OFFICIAL USE ONLY

Reference No. 13/0036/1c
Date of Receipt 4/2/13
Fee Paid £2233.00
Date Fee Received 4/2/13
Date Valid
Receipt No. 1876

PLANNING APPLICATION

Town & Country Planning (Scotland) Acts

The undemoted applicant hereby makes application for Planning Permission for the development described on this form and the accompanying plans.

see note 1

1. Particulars of Applicant	Particulars of Agent (if any) acting on applicants behalf:
Name <u>GORDAN DUNLOP</u> Address <u>PRIESTSIDE FARM</u> <u>AUCHENTIBER ROAD</u> <u>KILMACOLM</u> Postcode <u>PA13 4SP</u> Telephone Number	Name <u>BYLE BOYD PLANNING SOLUTIONS</u> <u>'ELLERSLEIGH'</u> Address <u>CASTLE HILL ROAD</u> <u>KILMACOLM</u> Postcode <u>PA13 4EL</u> Telephone Number <u>01505 874489</u> Profession <u>TOWN PLANNER</u>

see note 2

2. Description of Development
<u>ERRECTION OF TWO WIND TURBINES</u> <u>(ENERCON E44 MODEL)</u> Site Location <u>PRIESTSIDE FARM, AUCHENTIBER ROAD, KILMACOLM</u> Site Area (hectares) <u>0.6065</u> Number of dwellinghouses proposed <u>N/A</u> New gross floorspace (sq. metres) <u>N/A</u>

see note 3

3. Application Type (Tick appropriate boxes)
(a) Permission in Principle <input type="checkbox"/> (c) Detailed Permission <input checked="" type="checkbox"/>
(b) Approval of Matters specified by conditions <input type="checkbox"/> (d) Change of Use of land/buildings <input type="checkbox"/>
(e) Other (please specify)

see note 4

4. Applicants interest in site (Tick appropriate box)
(a) Owner <input type="checkbox"/> (c) Tenant <input checked="" type="checkbox"/>
(b) Lessee <input type="checkbox"/> (d) Prospective Purchaser <input type="checkbox"/>
(e) Other (please specify) <u>PART OF ACCESS ROAD IN OWNERSHIP</u> <u>OF ADJACENT FARM.</u>

see note 5

5. Existing Uses

(a) Please state the existing use(s) of the land/buildings: FARM LAND

(b) Was the original building erected before 1st July 1948? N/A. Yes / No

Has the original building been altered or extended Yes / No

If yes, please indicate nature of alteration / extension and if possible approximate dates.....

If the land / buildings are vacant, please state last known use.....

see note 6

6. Access Arrangements and Parking (Tick appropriate box/es)

(a) Not Applicable	<input type="checkbox"/>	(e) Number of existing on site parking places	<input type="checkbox"/>
(b) New vehicular access proposed	<input checked="" type="checkbox"/>	(f) Number of proposed on site parking places	<input type="checkbox"/>
(c) Existing vehicular access to be altered / improved	<input type="checkbox"/>	(g) Detail of any available off site parking	<input type="checkbox"/>
(d) Separate pedestrian access proposed	<input type="checkbox"/>		

see note 7

7. Drainage Arrangements (Tick appropriate box/es)

(a) Not Applicable	<input checked="" type="checkbox"/>	(c) Connection to existing public sewer	<input type="checkbox"/>
(b) Public Sewer	<input type="checkbox"/>	(d) Septic Tank	<input type="checkbox"/>

If (d), indicate method of disposal of effluent (e.g. soakaway, watercourse etc).....

see note 8

8. Water Supply (Tick appropriate box/es)

(a) Not Applicable	<input checked="" type="checkbox"/>	(c) Existing private supply	<input type="checkbox"/>
(b) Public Main	<input type="checkbox"/>	(d) Proposed private supply	<input type="checkbox"/>

If (c) or (d), please specify nature of supply source and proposed storage arrangements.....

see note 9

9. Building Materials (Complete as appropriate)

(a) Not Applicable	<input checked="" type="checkbox"/>	
(b) Outside Walls		Material..... Colour.....
(c) Roof Covering		Material..... Colour.....
(d) Windows		Material..... Colour.....
(e) Boundary Treatment		Material..... Colour.....

see note 10

10. Landscaping

Is a landscaping/tree planting scheme proposed?

Yes

No

Are any trees/shrubs to be cleared on site?

Yes

No

If yes, please show details of scheme on a SITE PLAN

see note 11

11. Costings

What is the estimated costs of any works to be carried out?

£.....

see note 12

12. Confirmation

Signature of applicant/agent.....

[Redacted Signature]

on behalf of GORDON DUNLOP

Date 4/2/13

see note 13

CERTIFICATES UNDER ARTICLE 15 OF THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)(SCOTLAND) REGULATIONS 2008

Either certificate A, B or C must be completed together with certificate E

CERTIFICATE A (To be completed where the applicant is owner of the whole application site including any access visibility splays and land required for drainage systems or water connections)

I hereby certify that:

No person other than * myself/the applicant was an owner (refer to note (a)) of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application

CERTIFICATE B (To be completed where the applicant does not own the whole application site including any access visibility splays and land required for drainage systems or water connections)

I further certify that:

* I have/~~the applicant~~ has given the requisite notice (Notice No.1) to all persons other than * ~~myself~~ / the applicant who at the beginning of the period of 21 days ending with the date of the accompanying application were (refer to note (a)) owners of any part of the land to which the application relates.

Name(s) of Owner

Address(es)

Date of Service of Notice(s)

DAVID CONNELL

HIGH MATHERNOLIC FARM
AUCHENTIBER ROAD
KILMACOLM PA13 4SP

4/2/13

* Delete whichever is inappropriate

NOTE (a) Any person who in respect of any part of the land is the proprietor of the dominium utile or is the lessee under a lease thereof of which not less than 7 years remains unexpired.

CERTIFICATE C (To be completed in EVERY CASE)

I further certify that:

* (1) None of the land to which the application relates constitutes or forms part of an agricultural holding


* (2) ~~I have/the applicant has given the requisite notice to every person other than myself/himself who at the beginning of the period of 21 days ending with the date of the application was a tenant of any agricultural holding any part of which was comprised in the land to which the application relates~~

These persons are: Name(s)	Address(es)	Date of Service of Notice(s)
.....
.....
.....

CERTIFICATED

I confirm that I have been unable to notify all parties under Certificates A, B and C

* Delete whichever is inappropriate

Signature of Applicant/Agent 
 On behalf of GORDON DUNLOP
 Date 4/2/13

see note 15

CHECKLIST - The following documentation should be submitted:

please tick all boxes

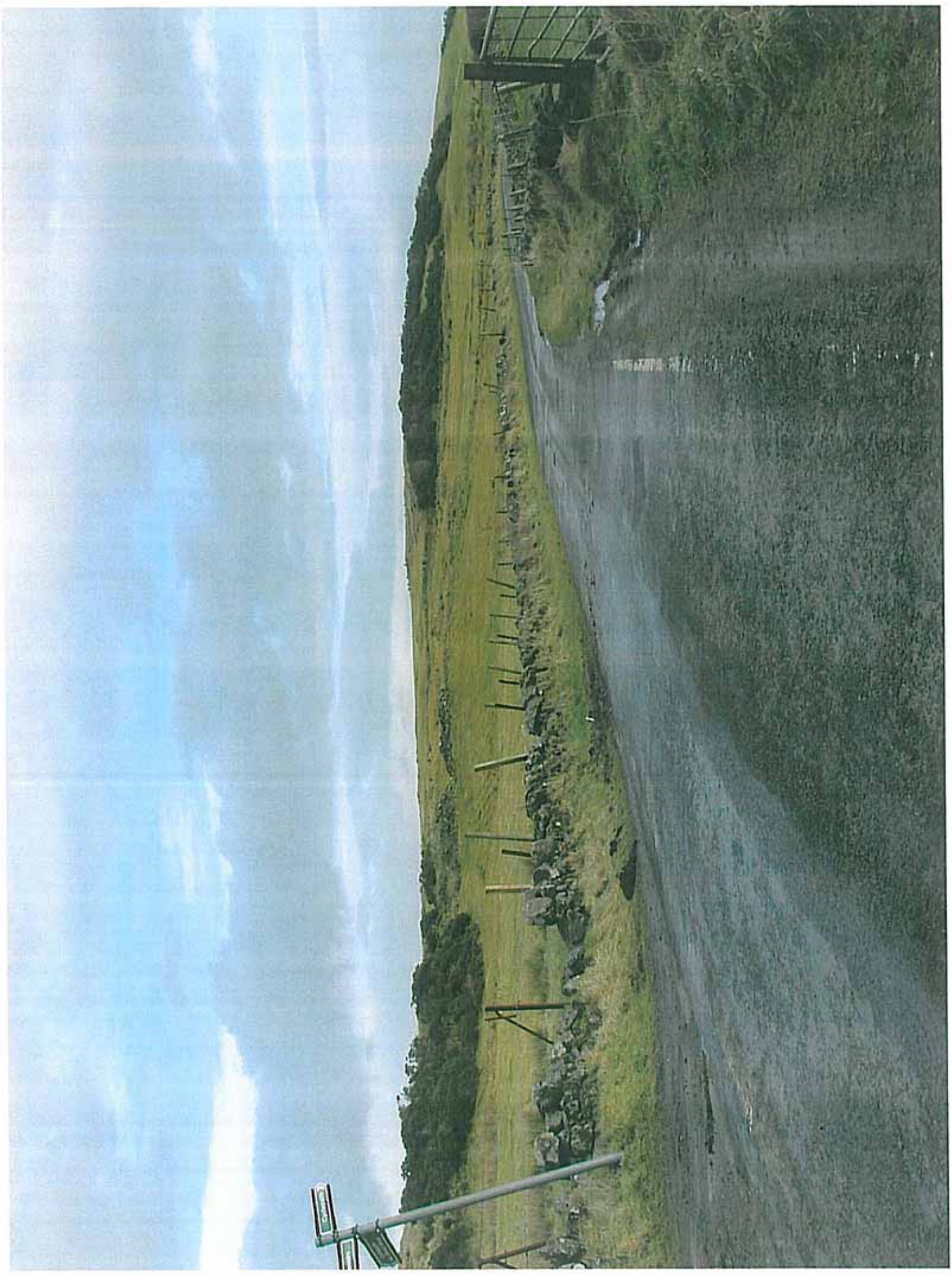
- | | |
|---|--|
| <input checked="" type="checkbox"/> TWO APPLICATION FORMS | <input type="checkbox"/> DESIGN & ACCESS STATEMENT
(National and Major applications only) |
| <input checked="" type="checkbox"/> FOUR SETS OF PLANS | <input type="checkbox"/> PRE-APPLICATION CONSULTATION REPORT
(National and Major applications only) |
| <input checked="" type="checkbox"/> FEE (Where appropriate) | |

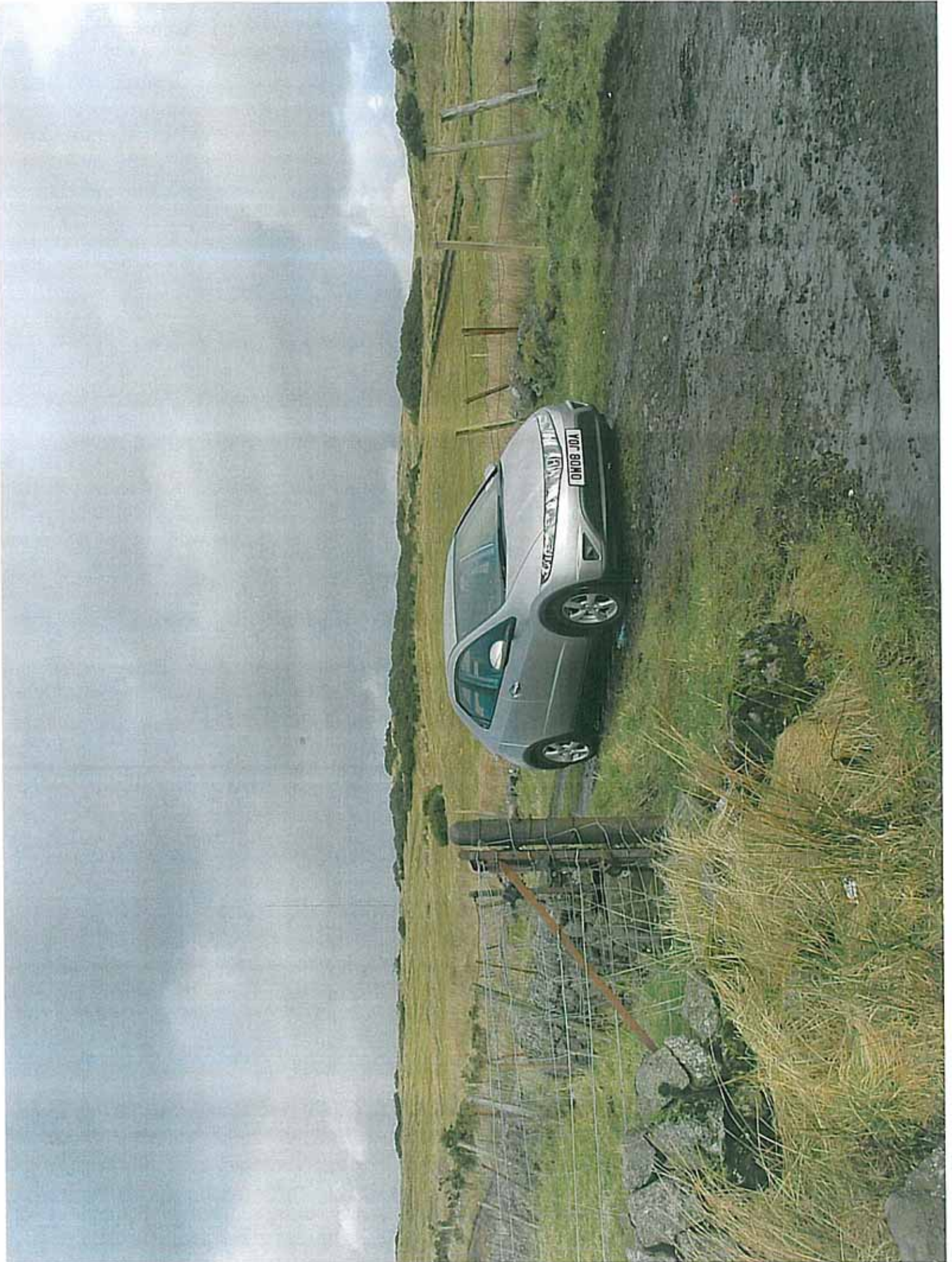
WARNING

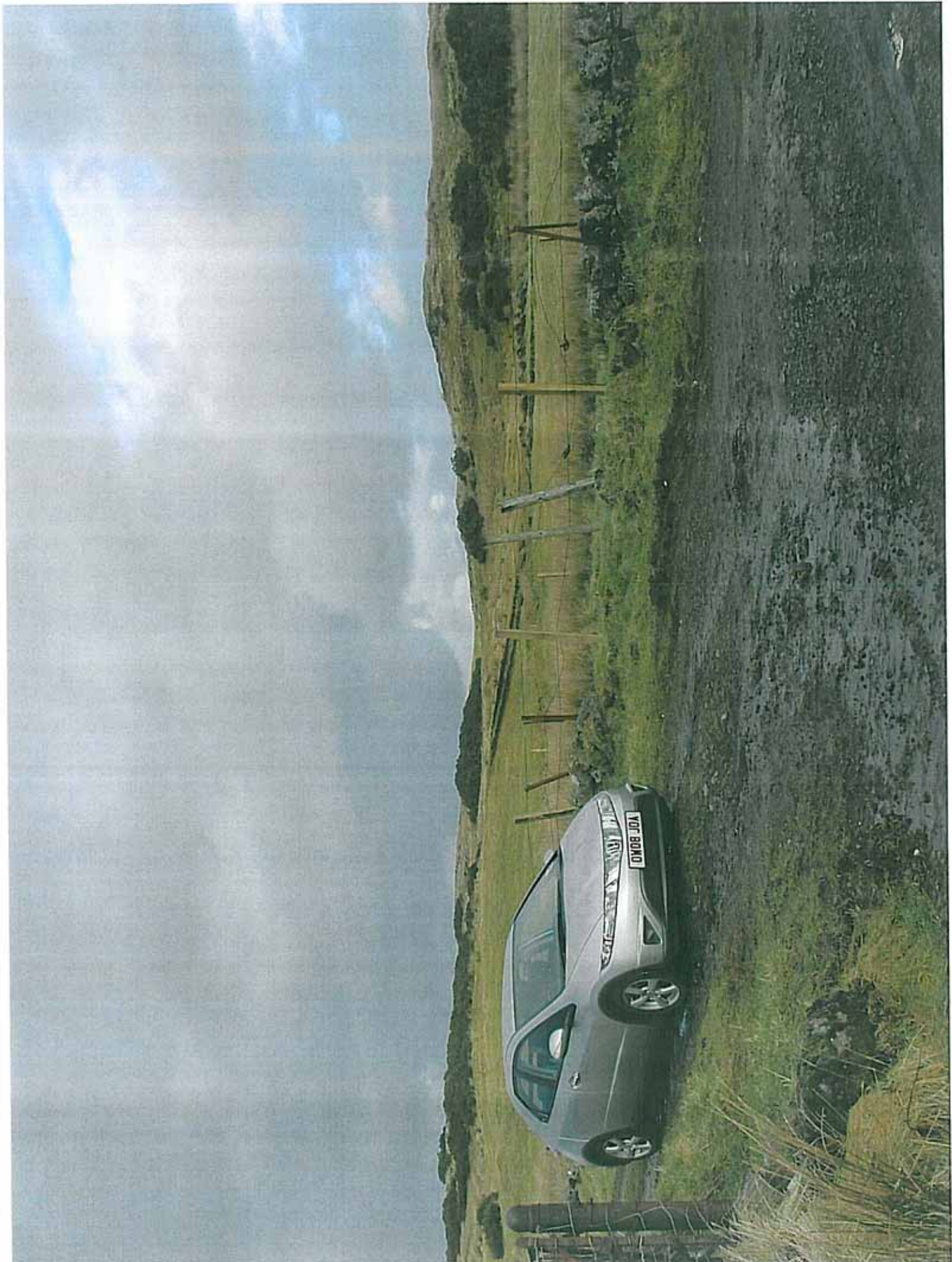
If any person issues a certificate which purports to comply with the requirements of Section 35 of The Town and Country Planning (Scotland) Acts, and contains a statement which he knows to be false or misleading in a material particular or recklessly issues a certificate which purports to comply with those requirements and which contains a statement which is false or misleading in a material particular he shall be guilty of an offence and liable on summary conviction to a fine not exceeding level 3 on the standard scale.

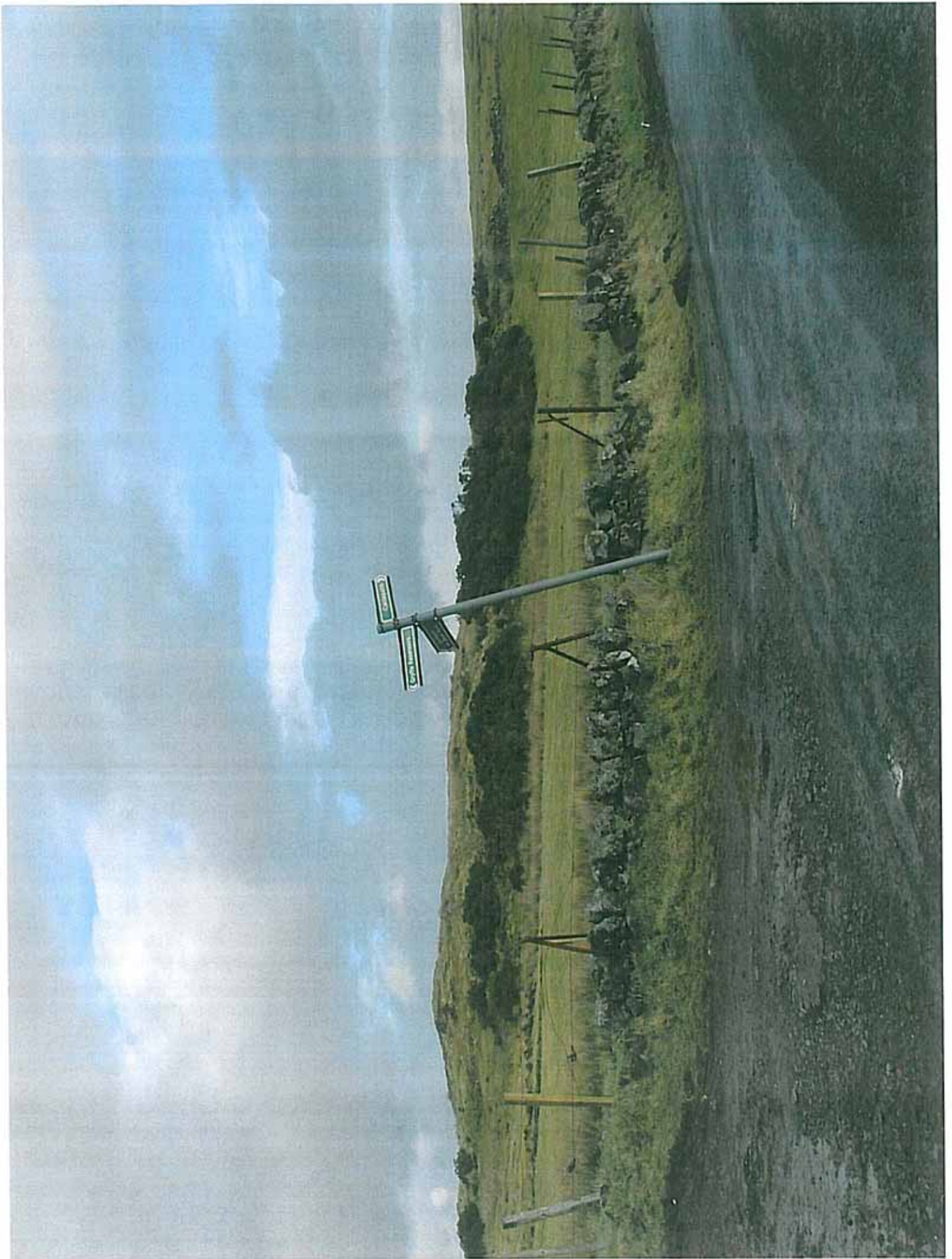
Revision 'A' - November 2008
 Revision 'B' - December 2008
 Revision 'C' - July 2009
 Revision 'D' - October 2009

SITE PHOTOGRAPHS









**REPORT OF HANDLING DATED 18 APRIL
2013**

REPORT OF HANDLING

Report By: Guy Phillips

Report No: 13/0036/IC

**Contact
Officer:** 01475 712422

Date: 18th April 2013

Subject: Erection of 2 No. 67 metre high (to blade tip) wind turbines at
Priestside Farm, Auchentiber Road, Kilmacolm

SITE DESCRIPTION

The site is in the countryside, between Port Glasgow and Kilmacolm, approximately 700m to the north of Priestside Farm steading on Auchentiber Road. It is within the Green Belt and the Devol Road Upland Site Of Important Nature Conservation (SINC). There are two lines of electricity pylons running to the north and south of the site. Approximately 400m to the west, at High Mathernock Farm is the site of a 67m high to blade tip wind turbine, granted planning permission in August last year. There is a temporary anemometer mast on the wind turbine site at High Mathernock.

Residential properties in proximity to the site include Auchentiber Farm to the west, High Mathernock Farm, Priestside Farm, "Cauldside" and "Pennysteral", Gryffeside Farm and Overwood all to the south and "West Kilbride" and "Cunston Cottage" to the east.

PROPOSAL

It is proposed to erect two wind turbines, each with a height of 67m to blade tip. Access would be by a Y shaped track to be formed off Devol Track, approximately 500m to the west. The access track is also within the Devol Road Upland SINC site.

The planning application is accompanied by maps detailing location and context, topography, theoretical visibility and cumulative impact, photomontages and wire frame diagrams and a Landscape Statement, all to illustrate visual impact within a 15km radius of the site. Also submitted are an Associated Infrastructure Assessment, Newt Habitat Survey, Bat Survey, Otter & Water Vole Survey, Bird & Badger Impact Assessment and a Noise Impact assessment.

The maps accompanying the planning application illustrate that views of the proposed turbines are possible from as far afield as Johnstone, Bonhill, Dumbarton, Cardross, Helensburgh, Roseneath and Kilcreggan. Within Inverclyde, long views are possible from Kilmacolm, Quarriers Village and the eastern periphery of Port Glasgow.

Through their supporting information the applicant reaches the following conclusions:

1. The combination of the approved wind turbine at High Mathernock and those proposed would elevate the level of cumulative impact within the area. Their uniformity and proximity would maintain the impression of a single, uniform, development, preferable to widespread and mismatching developments in the future.

2. If suitable agreements can be put in place with the Roads Authorities for necessary upgrades, the route to the site can be navigated by vehicles carrying the components of the wind turbines.
3. There is no significant impact upon the three Scheduled Ancient Monuments within 2km of the site; Pennysteral Farm Motte, High Mathernock Anti-Aircraft Battery and Craigmarloch Wood Fort.
4. The development would not be visible to Glasgow Airport's Primary Radar System or any military radar installation.
5. The turbines are a safe distance away from a replacement line of electricity pylons proposed to the north of the site.
6. Pollution threats, including upon private water supply, are minimal.
7. As the turbines are in excess of 10 rotor diameters from the nearest house, they comply with Scottish Planning Policy on shadow flicker.
8. There is not anticipated to be any impact on communication systems.
9. There is no significant likelihood of any impact on Great Crested Newts.
10. Impact upon individual bats and bat populations is expected to be very low.
11. It is considered unlikely that otters shall suffer any significant negative impacts from construction works, the operation of the wind turbines and their decommissioning.
12. The proposed turbines, access track, turning areas and crane pads will have an impact of very low significance on the SINC habitats and to bird life using the area and no effect on badgers.
13. There is unlikely to be disturbance from noise.

The applicant has confirmed that the output from the proposed turbines is not for local need and is to be fed into the national grid. The Planning Statement submitted with the planning application confirms that an application has been made to Scottish Power to connect to either of the existing 11kV or 33kV overhead line networks.

LOCAL PLAN POLICIES

Local Plan Policy UT6 - Renewable Energy Infrastructure

In assessing proposals for renewable energy infrastructure, Inverclyde Council, as Planning Authority, will have regard to the impact on:

- (a) the natural environment and built heritage of the locality;
- (b) the landscape, particularly when viewed from major transport corridors;
- (c) residential amenity;
- (d) tourism and leisure resources, particularly if within the Clyde Muirshiel Regional Park; and
- (e) the operation of aircraft and telecommunications equipment.

Local Plan Policy UT6A - Wind Farms of 20MW and Above

Wind farms with an output of 20 MW and over will be supported where:
Wind farms with an output of 20MW and over will be supported where:

- a) the objectives of international natural heritage designation are not compromised or where the proposed development is likely to have an adverse effect:
- there is no alternative solution; and
 - there are imperative reasons of over-riding public interest, including those of a social or economic nature;
- b) the objectives of national natural heritage designation and the overall integrity of the area are not compromised or where any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social and economic benefits of national importance;

and where the proposed development:

- c) is sited within the landform to ensure it does not have a detrimental effect on the landscape and wider environment;
- d) does not have an unacceptable adverse impact on the positive strategic assets of Clyde Muirshiel Regional Park and the West Renfrew Hills Scenic Area, such as:
- i. landscape and visual amenity;
 - ii. tourism;
 - iii. recreation; and
 - iv. conservation;
- e) does not have an unacceptable adverse impact directly on the built heritage of the area or its setting;
- f) does not have an unacceptable adverse impact on biodiversity;
- g) does not have an unacceptable impact on the water environment, including its quality, quantity and ecological status;
- h) does not lead to unacceptable cumulative impacts on the landscape;
- i) does not have an unacceptable adverse effect on aviation interests;

and where:

- j) in consultation with the relevant bodies, the presence of notifiable installations and exclusion zones are taken into account when designing sites; and
- k) in consultation with the relevant bodies, the presence of broadcasting and telecommunications infrastructure are taken into account when designing sites.

Note (1) These criteria would also apply to smaller scale wind farms (<20MW) which can often be more easily accommodated in the landscape, therefore, some of the areas that are not suitable for strategic wind farms could be acceptable. It would still be necessary to protect the environmental and built heritage resources and the local community by ensuring they were designed and sited to incur minimum impact. Given the variety of combinations and sizes of turbines that could be used to produce an output up to 20MW, it is likely that it will only be possible to determine what is acceptable when specific applications are assessed.

Local Plan Policy UT6B - Small Scale Wind Turbine development

In assessing proposals for small scale wind turbine developments, Inverclyde Council, as Planning Authority, will be supportive where the proposed development satisfies the criteria of Local Plan

Policies UT6 and UT6A, where relevant, and will have regard to the impact on:

- a) neighbouring/adjoining properties and residential amenity generally;
- b) road safety;
- c) natural and built heritage resources in proximity to the site;
- d) wildlife resources and habitats;
- e) proximity to pylons and overhead power lines, and other service infrastructure; and
- f) the landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements, and when set against the skyline.

Local Plan Policy DS8 - Green Belt

There is a presumption against development in the designated Green Belt, as identified on the Proposals Map. Proposals will only be considered favourably in exceptional or mitigating circumstances and where the criteria for development in Policy DS10 for the 'Countryside' can be satisfied.

Local Plan Policy DS10 - Countryside

Development within the countryside (including the Green Belt) will be permitted only where it can be supported with reference to the following criteria:

- (a) it is required for the purposes of agriculture and forestry;
- (b) it is a recreation, leisure or tourism proposal which is appropriate for the countryside and contributes to the social and economic development of the area;
- (c) there is a specific locational requirement for the use and it cannot be accommodated on an alternative site;
- (d) it entails appropriate re-use of vacant buildings which it would be desirable to retain for their historic or architectural character; or
- (e) it forms part of an establishment or institution standing in extensive grounds; and
- (f) it does not adversely impact on the landscape character;
- (g) it does not adversely impact on the natural heritage resource;
- (h) it does not adversely affect the visual amenity of the area and is capable of satisfactory mitigation;
- (i) there is a need for additional land for development purposes, provided it takes account of the requirements of the Structure Plan; and
- (j) it complies with other relevant Local Plan policies.

Local Plan Policy HR1 - Designated Environmental Resources and Built Heritage

Development that would adversely affect, directly or indirectly, the natural or built heritage resources listed in Schedule 9.1 and where indicated, on the Proposals Map, will not normally be permitted.

Having regard to the designation of the environmental resource and built heritage, exceptions will only be made where:

- (a) Sites of Special Scientific Interest (SSSI) will not be compromised;
- (b) visual amenity and townscape will not be compromised;
- (c) no other site, identified in the Local Plan as suitable, is available;
- (d) the social and economic benefits of the scheme outweigh the total or partial loss of the environmental resource;
- (e) the developer has demonstrated that the impact of the development on the environment will be minimised; and
- (f) the loss can be compensated by habitat creation/site enhancement elsewhere, and where there are satisfactory arrangements to achieve this.

CONSULTATIONS

CAA – No objections

NATS - CTC - No objections

MOD Safeguarding - No objections

BAA Aerodrome Safeguarding - No objections

Head Of Environmental And Commercial Services - No objections subject to conditions requiring the submission of a drainage impact assessment, reserving the size and weight of construction and maintenance vehicles, their route and number of trips and the submission of a remediation scheme for roads and verges.

Head Of Safer And Inclusive Communities - No objections subject to conditions to control the spread of Japanese Knotweed and any potential site contamination and to restrict noise.

West Dunbartonshire Council – no response.

Argyll And Bute Council – no response.

PUBLICITY

The application was advertised in the Greenock Telegraph on 15th February 2013 as there are no premises on neighbouring land.

SITE NOTICES

The nature of the proposal did not require a site notice.

PUBLIC PARTICIPATION

Six written representations have been received, including from Kilmacolm Civic Trust.

The objectors are concerned that:-

1. The turbines dominate the skyline with a visual impact extending to many dwellings falling within a 2km radius at Port Glasgow, Auchenbothie and Kilmacolm in addition to those in immediate proximity to them. The joint campus school under construction in Port Glasgow is also impacted.
2. To grant planning permission in this instance shall result in a proliferation of wind turbines spoiling the landscape in a disorganised and unplanned manner
3. In the appeal decision for the wind turbine approved at High Mathernock, the Reporter advised that any future proposals would have to be assessed on their own merit including the cumulative impact with existing turbines which would place a limit on the number allowed. He further advised that his conclusion may have been different if a greater number of turbines were proposed.
4. The development shall create a three turbine wind farm.
5. Consultation is on going for a development of 10, 110m high wind turbines on a site to the north of the application site. Approval of that development and that under consideration in this planning application would result in two wind farms, approximately 2km apart.

6. The turbines are commercial in scale, not for domestic use, visually obtrusive over long distances, have a differential speed range, cause shadow flicker and are inefficient.
7. Nearby houses shall be adversely impacted by noise and shadow flicker.
8. The Glasgow & Clyde Valley Landscape Assessment seeks to discourage the erection of additional masts and tall structures in the hills.
9. Wind turbines should not be sited in the Green Belt.
10. The area shall become less attractive to visitors.
11. Auchentiber Road carries a high degree of commuter traffic and serves as a short cut from Port Glasgow to Kilmacolm.
12. Private water supplies and wildlife shall be adversely affected by the construction works. Wildlife shall be further impacted by the rotor blades.
13. The applicant's assessment of the impact on migratory birds fails to mention the annual congregation of large numbers of Barnacle Geese to the west of Cunston Cottage.
14. Construction of the turbines shall result in the release of CO2 .
15. There is a danger from potential ice throw.
16. Future methods of harnessing wind energy may render wind turbines obsolete within a short timescale.
17. Fixed turbine technology is not commercially viable without government subsidy.
18. There shall be an adverse impact upon the values of nearby houses.
19. There is no economic benefit to the local area.

ASSESSMENT

The site is located within the Green Belt, where Local Plan policies DS8 and DS10 apply. However, as a renewable energy development which may be expected to be located in a Green Belt/rural location, it is considered appropriate to assess the proposal against national and local planning policy for such developments.

The general planning policy position, stemming from Scottish Planning Policy, is that planning authorities should support the development of a diverse range of renewable energy technologies and that development plans or supplementary guidance must clearly indicate factors that will be taken into account in decision making. The Government itself provides web based renewables advice and this is reflected in the Council's Interim Planning Policy Position Statement on Small Scale Wind Farms, approved by the Safe Sustainable Communities Committee in March 2011. This statement introduced a new Policy UT6B which identifies that the Council will be supportive of development where the criteria of Policies UT6 (Renewable Energy Infrastructure) and UT6A (Wind Farms of 20MW and above) have been met and there has been regard to:

- a) the impact on neighbouring and nearby properties and residential amenity generally;
- b) road safety;
- c) natural and built heritage resources in proximity to the site.
- d) wildlife resources and habitats.
- e) proximity to pylons and overhead power lines and other service infrastructure.

- f) the landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements, and when set against the skyline.

Policies UT6 and UT6A require consideration of the potential impact on the operation of aircraft and telecommunications equipment. I note, however, that the CAA, National Air Traffic Service, BAA and the MOD offer no objections.

The policies also require assessment of the impact on the natural and built environment, landscape, and residential amenity, all of which are also addressed by assessment against Policy UT6B (criteria a, c, d and f). Countryside tourism is inextricably linked to the quality of landscape and views from public vantage points, and it is appropriate to consider this in an assessment against Policy UT6B (criterion f).

Accordingly it remains to assess the application against the criteria listed in Policy UT6B with reference to Scottish Planning Policy and other development plan policies as applicable.

- a) Impact on neighbouring and nearby properties and residential amenity generally.

Policy UT6B requires development to have regard to impact on neighbours and general residential amenity. There are 9 residential properties in the immediate area surrounding the site of the proposed wind turbines. Potential impacts upon them arise from shadow flicker, noise and visual impact. The Scottish Government's online advice "Onshore Wind Turbines" advises that where separation is provided between wind turbines and nearby dwellings of 10 rotor diameters shadow flicker should not be a problem. The necessary separation distance in this instance, therefore, is 440m, which the proposal satisfies (the nearest house is approximately 627 metres distant). The proposal therefore accords with Government advice on separation for shadow flicker.

With respect to the issue of noise, there are no objections from the Head of Safer and Inclusive Communities.

Adverse visual impact is of most significance to those living closest to it and is a key factor in the determination of the application. The photomontages submitted with the planning application are taken at distances ranging between 860m and 4.78km. The wind turbines would be highly visible from the closest dwellings set within an area of rolling countryside. At a distance of a little over 600m metres to the nearest house, I consider that the visual impact of large turbines will be of major significance to residents living closest to them and forms grounds for refusal of the application.

- b) Road safety. There are no objections from the Head of Environmental and Commercial Services on road safety grounds.

- c) and d) Natural and built heritage resources in proximity to the site and wildlife resources and habitats.

The site is within a SINC and as such it also requires assessment against Policy HR1. The policy advises that development that would adversely affect, directly or indirectly, listed natural or built heritage resources will not normally be permitted. The proposal requires further assessment against criteria (a) - (e) within policy HR1:

- (a) Sites of Special Scientific Interest will not be compromised. The proposal does not affect an SSSI and is, therefore, acceptable in this regard. I accept the applicant's conclusion that the proposal has an impact of very low significance on the SINC habitats.
- (b) Visual amenity and townscape. I shall assess this impact in detail under criterion (f) of policy UT6B.
- (c) No other site, identified in the Local Plan as suitable is available. While no other site has been identified as suitable for large scale wind turbine development in this part of

Inverclyde's countryside, I do not consider that that provides any justification for granting planning permission.

- (d) The social and economic benefits of the scheme outweigh the total or partial loss of the environmental resource. In determining the appeal for the wind turbine at High Mathernock, the Reporter considered that the site has little conservation value. The application site lies within the same SINC site and I am in agreement with the conclusion of the Habitat Study.
- (e) The impact of the development on the environment will be minimised. I shall assess this impact in detail under criterion (f) of policy UT6B.
- (f) Loss can be compensated by habitat creation/site enhancement elsewhere on the applicant's land. The site is small and habitat disruption may be compensated elsewhere.

Overall, I am satisfied that policy HR1 is not compromised.

e) Proximity to pylons and overhead power lines and other service infrastructure. Two existing power lines run to the north and south of the site. I consider that there is sufficient distance between the proposed turbine and overhead lines for safety not to be an issue.

f) The landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements, and when set against the skyline.

Criterion (b) of Policy HR1 and criterion (f) of Policy UT6B require consideration to be given to visual amenity with particular reference to the experience of the landscape when viewed from public vantage points, including local roads, neighbouring settlements and when set against the skyline. The main public vantage points in close proximity are Auchentiber Road, the B788 and Auchenbothie Road. The submitted photomontages demonstrate that the turbines are seen to break the skyline from all of these roads. At a distance of around 600 metres from Auchentiber Road, at its nearest point, I consider this breaking of the skyline to be of significance and to have an adverse impact upon visual amenity.

Scottish Government guidance for assessing visual impact indicates that scale is a relevant consideration, taking into account the significance of the landscape and the views, proximity, intervisibility and sensitivity of visual receptors. I agree with part of the conclusion of the Landscape Statement i.e. the combination of the approved wind turbine at High Mathernock and those proposed would elevate the level of cumulative impact within the area. The remainder of the conclusion of the Landscape Statement that uniformity and proximity would maintain the impression of a single, uniform, development, preferable to widespread and mismatching developments in the future does not, I consider provide justification for further large scale wind turbine development in this part of Inverclyde's countryside. As evidenced by the photomontages and wire frame diagrams submitted with the planning application, the turbines would appear as dominant elements in the landscape and be seen to break the skyline in numerous directions

I acknowledge the lines of pylons running to the north and south of the site as an existing element of the landscape. Unlike wind turbines, however, these are a static feature. The turbines are, to blade tip, higher and being animated features, are a greater visual intrusion. I consider this to be to the visual detriment and experience of the landscape.

I consider the view of the Reporter in the determination of the appeal for the turbine approved at the adjoining High Mathernock key to the assessment of impact upon views from further afield. He took the view that a single turbine when viewed from Kilmacolm, Port Glasgow and further afield in Argyll, would not be significant. Critically, however, he also advised that his conclusion may have been different if a greater number of turbines were proposed. The proposal would result in a trebling of the presence of large wind turbines in this part of Inverclyde's countryside. As evidenced by the photomontages and wire frame diagrams, there is a significant and adverse visual impact upon the views of the site from the boundaries of Port Glasgow and Kilmacolm.

In summary, while there are wind turbines elsewhere throughout Scotland which are significantly higher than that proposed I consider that within the context of the local landscape, the presence of

nearby houses and proximity to the B788 road, the 67m high turbines, when added to the 67m high turbine granted on appeal at the adjoining High Mathernock, have an adverse cumulative impact on visual amenity and landscape character.

In response to the objectors' concerns not covered by my assessment against the Local Plan:

The area shall become less attractive to visitors: Auchentiber Road is designated as a core footpath, encouraging walkers into the countryside. Policy LR6 informs that the Council will seek to protect and promote the 'core path network' (both existing and proposed) and the other key themes of the adopted Inverclyde Access Strategy. In determining the appeal for the wind turbine previously granted planning permission at High Mathernock, the Reporter determined that the scale of the development would be unlikely to discourage many people walking past on a through route. He further determined that some individuals may regard the turbine as being of visual interest. The proximity of the proposed wind turbines to that granted on appeal satisfy me that the Reporter's view regarding potential impact on users of the Core Footpath remains valid.

Private water supplies and wildlife shall be adversely affected by the construction works – impact upon private water supplies is, I consider, satisfactorily addressed by the Hydrology & Geology section of the Associated Infrastructure Assessment and there are no objections from the Head of Safer & Inclusive Communities.

Wildlife shall be further impacted by the rotor blades: I am in agreement with the conclusions of the Newt Habitat Survey, Bat Survey, Otter & Water Vole Survey, Bird & Badger Impact Assessment that there are no significant impacts upon wildlife.

There is a danger from potential ice throw: While there may be a small potential risk from ice throw in cold conditions, I consider that this does not justify refusal of planning permission.

There shall be an adverse impact upon the values of nearby houses: This is not a material Planning consideration

There is no economic benefit to the local area: The fact that output from the turbines is to be fed direct to the National Grid, for profit, determines that there is no specific requirement for them at the location, however, given Government policy to support renewable energy, that does not provide a justification for refusal of planning permission.

Given my unfavourable assessment of impacts upon visual amenity and landscape character I consider the proposal fails to accord criterion (f) of Policy UT6B, and consequently Policy UT6 (criterion b) and Policy UT6A (criterion c).

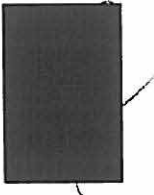
DECISION

That the application be refused for the following reason:

1. The height and scale of the proposed turbines and their proximity to the wind turbine granted planning permission at High Mathernock, nearby housing, Auchentiber Road, Auchenbothie Road, the B788, Kilmacollm village and the eastern part of upper Port Glasgow have a cumulative impact in creating an unexpected and dominant collective feature in this part of the Inverclyde countryside to the detriment of visual amenity and landscape character and thus contrary to:
 - a. Policy UT6 of the Inverclyde Local Plan, criterion (b) which requires regard to be given to the landscape, especially when viewed from major transport corridors.

- b. Interim Inverclyde Local Plan Policy UT6A, criterion (c) which requires turbines to be sited within the landform to ensure that they do not have a detrimental effect on the landscape and wider environment.
- c. Interim Inverclyde Local Plan Policy UT6B, criterion (f) which requires regard to be given to the landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements and when set against the skyline.

Signed:

A black rectangular redaction box covering the signature of the Case Officer.

Case Officer: Guy Phillips

A black rectangular redaction box covering the name of the Head of Regeneration and Planning.

Stuart Jamieson
Head of Regeneration and Planning

CONSULTATION RESPONSES

Glasgow Airport

Discover the world

FAO Guy Phillips
Inverclyde Council
By Email

Glasgow Airport
Paisley PA3 2SW
Scotland

T. +44 (0)870 040 0008
W. glasgowairport.com

19 February 2013

Dear Guy Phillips

Re: 13/0036/IC: Erection of 2 No. 67 metre high (to blade tip) wind turbines
Our reference: GLA2501

I refer to your consultation request received in this office on 7th February 2013.

The proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. We, therefore, have no objection to this proposal.

Yours sincerely



Kirsteen MacDonald

Safeguarding Manager
Glasgow Airport
0141 842 7960
Kirsteen.MacDonald@bsa.com



From: Windfarms [mailto:Windfarms@caa.co.uk]
Sent: 15 April 2013 09:26
To: Devcont Planning
Subject: RE: Consultation Request - Priestside Farm, Auchentiber Road, Kilmacolm

Dear Sir/Madam

Request for Comment under the Town and Country Planning Act 1990 and the Town and Country Planning (Scotland) Act 1997

There is currently a high demand for CAA comment on wind turbine applications which exceeds the capacity of the available resource to respond to requests within the timescales required by Local Planning Authorities. The CAA has no responsibilities for safeguarding sites other than its own property, and a consultation by a Council is taken as a request for clarification of procedural matters. Councils are reminded of their obligations to consult in accordance with ODPM/DIT Circular 1/2003 or Scottish Government Circular 2/2003, and in particular to consult with NATS and the Ministry of Defence as well as any aerodromes listed in Annex 3 of the above documents, taking note of appropriate guidance and policy documentation. Should the Council be minded to grant consent to an application despite an objection from one of the bodies listed in the circular, then the requisite notifications should be made.

Whilst the CAA recommends all aerodrome operators/license holders develop associated safeguarding maps and lodge such maps with local planning authorities, the CAA additionally encourages councils/planning authorities to undertake relevant consultation with known local aerodromes regardless of status or the existence of any aerodrome/council safeguarding agreement, including local emergency service Air Support Units (e.g. Police Helicopter or Air Ambulance).

There is an international civil aviation requirement for all structures of 300 feet (91.4 metres)* or more to be charted on aeronautical charts. However, on behalf of other non-regulatory aviation stakeholders, in the interest of Aviation Safety, the CAA requests that any feature/structure 70 feet in height, or greater, above ground level is notified to the Defence Geographic Centre [CGDGC-ProdAISAfDb@mod.uk], including the location(s), height(s)* and lighting status of the feature/structure, the estimated and actual dates of construction and the maximum height of any construction equipment to be used, at least 6 weeks prior to the start of construction, to allow for the appropriate notification to the relevant aviation communities.

Any structure of 150 metres* or more must be lit in accordance with the Air Navigation Order and should be appropriately marked. Although if an aviation stakeholder (including the MOD) made a request for lighting it is highly likely that the CAA would support such a request, particularly if the request falls under Section 47 of the Aviation Act.

Cumulative effects of turbines may lead to unacceptable impacts in certain geographic areas.

The Ministry of Defence will advise on all matters affecting military aviation.

Should the Council still have a specific query about a particular aspect of this application the CAA will help in the clarification of aviation matters and regulatory requirements. Site operators remain responsible for providing expert testimony as to any impact on their operations and the lack of a statement of objection or support from the CAA should not be taken to mean that there are no aviation issues, or that a comment from an operator lacks weight.

Guidance relating to the impact of wind turbines upon aviation can be found at <http://www.caa.co.uk/docs/33/Coop764.pdf>. More generic comment relating to the CAA involvement in the planning process is described at http://www.caa.co.uk/docs/33/DAP_GuidanceOnCAAPanningConsultationRequirements.pdf.

Yours Faithfully

K LIGHTOWLER
Squadron Leader (RAF)

Surveillance and Spectrum Management
Directorate of Airspace Policy
Civil Aviation Authority
45-59 Kingsway London WC2B 6TE
Tel: 020 7453 8534 Fax: 020 7453 8565
windfarms@caa.co.uk

*The effective height of a wind turbine is the maximum height to blade tip.

From: Grant Kennedy [<mailto:Grant.Kennedy@inverclyde.gov.uk>] **On Behalf Of** Devcont Planning
Sent: 27 March 2013 15:53
To: Windfarms
Subject: Consultation Request - Priestside Farm, Auchentiber Road, Kilmacollm

Consultation Request - Planning Application Ref - 13/0036/IC
Please can you comment on the application detailed in the attachment.
Could you reply at devcont.planning@inverclyde.gov.uk

Inverclyde Council

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**Defence
Infrastructure
Organisation**

Dominic Martin
Safeguarding Assistant
Ministry of Defence
Safeguarding – Wind Energy
Kingston Road
Sutton Coldfield
West Midlands B75 7RL
United Kingdom

Your Reference: 13/0036/IC

Telephone [MOD]: +44 (0)121 311 2195

Facsimile [MOD]: +44 (0)121 311 2218

Our Reference: DIO/C/SUT/43/10/1/17947

E-mail: [DIOOpsNorth-
LMS7a2b1@mod.uk](mailto:DIOOpsNorth-LMS7a2b1@mod.uk)

Mr Guy Phillips
Planning Department
Inverclyde Council
Cathcart House
6 Cathcart Square
Greenock
PA15 1LS

19th February
2013

Dear Mr Phillips

Please quote in any correspondence: 17947

Site Name: Priestside Farm

Proposal: Erection of Wind Turbines

Planning Application Number: 13/0036/IC

Site Address: Auchentiber Road, Kilmacolm

Thank you for consulting the Ministry of Defence (MOD) on the above Planning Application in your communication dated 7th February 2013.

I am writing to tell you that the MOD has no objection to the proposal.

The application is for 2 turbines at 67 metres to blade tip. This has been assessed using the grid references below as submitted in the planning application or in the developers' your pro-forma.

Turbine	100km Square Letter	Easting	Northing
1	NS	32615	72120
2	NS	32895	71815

The principal safeguarding concern of the MOD with respect to the development of wind turbines relates to their potential to create a physical obstruction to air traffic movements and cause interference to Air Traffic Control and Air Defence radar installations.

Defence Infrastructure Organisation Safeguarding wishes to be consulted and notified of the progression of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.

If planning permission is granted we would like to be advised of the following;

- the date construction starts and ends;
- the maximum height of construction equipment;
- the latitude and longitude of every turbine.

This information is vital as it will be plotted on flying charts to make sure that military aircraft avoid this area.

If the application is altered in any way we must be consulted again as even the slightest change could unacceptably affect us.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

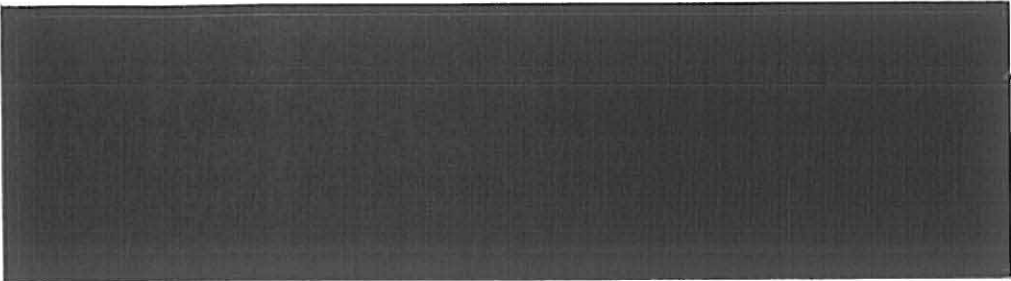
MOD: <http://www.mod.uk/DefenceInternet/MicroSite/DIO/WhatWeDo/Operations/ModSafeguarding.htm>

Yours sincerely



Dominic Martin
Safeguarding Assistant – Wind Energy
Defence Infrastructure Organisation

SAFEGUARDING SOLUTIONS TO DEFENCE NEEDS



From: ALLEN, Sarah J [mailto:Sarah.ALLEN@nats.co.uk] **On Behalf Of** NATS Safeguarding
Sent: 12 February 2013 11:01
To: Devcont Planning
Subject: Your Ref: 13/0036/IC (Our Ref: W(F)16644)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NERL (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application.

This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NERL in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully,

Sarah Allen
Technical Administrator
On behalf of NERL Safeguarding Office

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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

M E M O R A N D U M

To: David Ashman
Development Management

Date: 26. February 2013

From: Fergus Macleod
Planning Policy and Property Manager

Our Ref: C1.1/MP

☎ 01475 712493

Your Ref:

Subject: **Erection of 2 No. 67 metre high (to blade tip) wind turbines at Priestside Farm
Auchentiber Road Kilmacolm**

National Planning Guidance

Scottish Planning Policy (SPP) 2010 encourages the promotion of this scale of renewable energy, stating that:

*"Planning authorities should support the development of a diverse range of renewable energy technologies, guide development to **appropriate locations** and provide clarity on the issues that will be taken into account when specific proposals are assessed."*

and

"...Development plans should support all scales of development associated with the generation of energy and heat from renewable sources, ensuring that an area's renewable energy potential is realised and optimised in a way that takes account of relevant economic, social, environmental and transport issues and maximises benefits. Development plans should support the wider application of medium and smaller scale renewable technologies..."

Development Plan

The proposed development lies within the Green Belt and the Devol Road Upland SINC and is adjacent to the Core Path 37B at Auchentiber Road. It therefore requires to be assessed against Policies **DS8: Green Belt**, **DS10: Countryside**, **HR1: Designated Environmental Resources and Built Heritage** and **LR6: Inverclyde Access Strategy** of the adopted Inverclyde Local Plan 2005 as well as the Interim SPG for Wind Farms 2010 Policy **UT6A: Wind Farms of 20MW and Above** (with particular reference to Note 1) and Policy **UT6B: Small Scale Wind Turbine Development** which supplement Policy **UT6** of the adopted Local Plan 2005.

The proposed development would be located just within the western boundary of the Devol Road Upland SINC which contains a number of varied habitats. Care would, therefore, have to be taken to ensure that minimal disruption is caused to flora, fauna and habitats during development and while in use.

The Ecology Statement submitted appears to be fairly thorough, but there are several points which have been noted by the Council's ecologist.

1. Habitat loss is likely to have a minimal effect within the broader area. The site in question is relatively accessible using the existing Devol Road therefore reducing the impact of habitat damage during the construction phase, although there will be some within the field itself between Devol Road and the turbine site.

2. Devol Road itself is a designated Core Path (37B) and access along this route should be retained at all times during construction. Any damage to the path surface should be made good.

3. The main point of concern regards Hen Harriers, a target species within our approved LBAP. The statements relating to Hen Harriers, in particular the interpretation of Mr. Iain Gibson's comments are at the very least open to alternative interpretation.

Given that Mr. Gibson's observations include that the site is within known winter foraging areas, it is poor to suggest that the impact of the proposal will be low based purely on recent poor numbers of breeding birds. Obviously the conservation efforts being carried out by the Council's partners (Clyde Muirshiel Regional Park, for example) are aimed at increasing populations and improving breeding numbers, and the import of Mr. Gibson's comments is that this will clearly have an effect in good breeding seasons.

A more obvious observation would be that the impact will be high in better breeding seasons. As recently as May 2012, a female Hen Harrier has been observed within 3km of the proposed site. Given the location of the observation, the nest site is likely to be Corlic Hill, which was specifically mentioned as the nest site most likely to result in foraging in the area in question.

Mr. Gibson's response gives the impression of being to a general question. There is a likelihood of Hen Harriers foraging within the area of the proposal. It may be advisable to request the applicant/agent to ask Mr. Gibson a more specific question relating to the impact of the proposals in good breeding seasons.

4. Greylag geese regularly graze in the area around Auchenfoyle Farm, and will shuttle between this area, the Clyde Estuary, and Auchendores Reservoir. The effect on this species is somewhat understated.

Criteria b) - d), and f) - i) of **Policy UT6A** are relevant to this application. In particular criterion d), visual impact, would be a notable concern given the height of the turbines and the cumulative impact likely to occur with the already consented 67m high turbine at nearby High Mathernock (12/0191/C). The proposed development would be visible from the southern fringes of Port Glasgow and from parts of Kilmacolm.

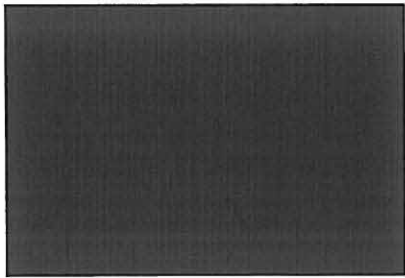
Criteria a) - f) of **Policy UT6B** are also relevant to this application.

The development would not impact on the core path other than the turbine being visible, as it would be from Auchentiber Road.

Conclusion

Taking all of the above into consideration, there is a support for this type of development at national level. The Green Belt location is acceptable and provided the visual impact of the proposed development and its impact on the biodiversity of the area can mitigated, this wind turbine development would be acceptable.

(Authorised by Fergus Macleod)

Flood Risk Assessment Criteria	Application Reference:	13/0036/IC
<p>Development: Erection of 2 no. 67 metre high wind turbines on Priestsideroad farm Auchentiber Road</p>		
		YES / NO
<p>1) Is any part of the site within 50m of a known flood location?</p> <p>2) Does a watercourse* pass through the site or is there one within 50m?</p> <p>3) Is there a reservoir, loch or pond within 50m of the site?</p> <p>4) Is there a sewerage storm overflow within 50m of the site?</p> <p>5) For coastal developments, does the site lie below 5m above ordnance datum?</p> <p>6) Does the developer propose to pipe or divert a watercourse?</p> <p>7) Is the site bounded by an existing flood protection measure?</p> <p>8) Have objections on grounds of flooding been raised?</p> <p>9) For some developments, ** has the developer submitted a Drainage Impact Assessment with their outline application?</p>	<p style="text-align: right;">NO</p> <p style="text-align: right;">YES</p> <p style="text-align: right;">NO</p> <p style="text-align: right;">NO</p> <p style="text-align: right;">NO</p> <p style="text-align: right;">NO</p> <p style="text-align: right;">NO</p> <p style="text-align: right;">NO</p> <p style="text-align: right;">NO</p> <p style="text-align: right;">NO</p>	
<p>* A watercourse includes a river, stream, burn and any ditch, drain, cut, canal, culvert, sluice or passage carrying or designed to carry water. It does not include any sewer or watermain.</p>		
<p>** All developments except household applications, developments of less than 10 houses, non household extensions under 100 square metres and changes of use not involving new build or hardstanding.</p>		
<p>If any item 1 – 9 is identified, a Flood Risk Assessment (to varying degrees) will be required.</p>		
<p>Guidelines on the submission of Drainage Impact Assessments and Flood Risk Assessments may be obtained from the Environmental Services.</p>		
<p>Additional Comments:</p>		
<ol style="list-style-type: none"> 1. Drainage details should be submitted for approval prior to work starting on site. 2. A drainage impact assessment should be submitted for approval. 3. Where the access road cross a stream or river, appropriate permission should be obtained from SEPA. 		
		

Memorandum	
Safer Communities Planning Application Consultation Response	
To: Planning Services For the Attention of Guy Phillips	
From: Safer and Inclusive Communities	Date of Issue to Planning: 7th March 2013

Lead Officer: Sharon Lindsay	
Tel: 01475 714 205	Email: Sharon.lindsay@inverclyde.gov.uk

Safer Communities Reference (optional):	
Planning Application Reference:	13/0036/IC
Planning Application Address:	Priestside Farm Kilmacolm
Planning Application Proposal:	Erection of 2x wind turbines

Team	Officer	Date
Food & Health	Michael Lapsley	
Environment & Safety	Sharon Lindsay	7/2/13
<i>Contaminated Land</i>	Roslyn McIntosh	8/2/13
Public Health & Housing	Jim Blair	25.2.13
Environment and Enforcement	Emilie Smith	07/03/13

Amend table entries as appropriate and insert date when each officer review is completed.



Recommended Conditions:

It is recommended that the undernoted conditions be placed on any consent the council may grant.

Delete or amend as appropriate

Food & Health

No Comments

Environment & Safety

No Comments

Contaminated Land

1. That prior to the start of development, details of a survey for the presence of Japanese Knotweed shall be submitted to and approved in writing by the Planning Authority and that, for the avoidance of doubt, this shall contain a methodology and treatment statement where any is found. Development shall not proceed until treatment is completed as per the methodology and treatment statement. Any variation to the treatment methodologies will require subsequent approval by the Planning Authority prior to development starting on site.

Reason: To help arrest the spread of Japanese Knotweed in the interests of environmental protection.

2. That the presence of any previously unrecorded contamination or variation to anticipated ground conditions that becomes evident during site works shall be brought to the attention of the Planning Authority within one week. Consequential Remediation shall not be implemented unless it has been submitted to and approved, in writing by the Planning Authority.

Reason: To ensure that all contamination issues are recorded and dealt with appropriately.

3. That no fill or landscaping material shall be imported onto the site until written details of the source and intended reuse of the imported materials has been submitted for approval, in writing by the Planning Authority. The report shall characterise the chemical quality (including soil-leachate and organic content etc), volume and source of the imported materials with corresponding cross-sections and plans indicating spatial distribution and depth/thickness of material placement within the development site. The material from the source agreed only shall be imported in strict accordance with these agreed details.

Reason: To protect receptors from the harmful effects of imported contamination.

Public Health & Housing

Comment:

This Service is currently investigating a complaint of rotor shadow flicker which alleges that statutory nuisance is being created in a house which is outwith the tenuous "10x blade diameter guide". As Pan 45 has been revoked we are left with the very limited two paragraphs of Scottish Government guidance in "Onshore Wind Turbines" which set no objective criteria but say;

"Where this could be a problem, developers should provide calculations to quantify the effect. In most cases however, where separation is provided between wind turbines and nearby dwellings (as a general rule 10 rotor diameters), "shadow flicker" should not be a problem.

However, there is scope to vary layout / reduce the height of turbines in extreme cases."

Severe rotor flicker has been witnessed by investigating officers but given the variable contributory factors, number and relative heights of rotors and affected houses; weather including frequency of clear sunny weather, wind speed and direction; relative height of the sun in the sky etc. an assessment will require to be carried out over one or more very lengthy

periods when the problem is encountered.

Computer programmes are available to predict flicker and as we already know that the 10 x rotor diameter is not foolproof it may be appropriate to require, in every case, that appropriate calculations are submitted with every application.

Given the information provided it is not possible for this service to comment further.

Environment and Enforcement

1. The level of noise emissions from the wind turbines when measured at any dwelling, lawfully existing at the date of permission shall not exceed:
 - a. between the hours of 23:00 and 07:00 the greater of 43dB L_{A,90} (10 min) or 5dB(A) above the Night Hours Background Noise level at that property; or
 - b. between the hours of 07:00 and 23:00 the greater of 40dB L_{A,90} (10 min) or 5 dB(A) above the quiet Waking Hours Day Time Background Noise Level at that property.

Reason: To protect the amenities of occupiers of premises from unreasonable noise and vibration levels.

Recommended Advisory Notes

No Comments

REPRESENTATIONS

Application Comments for 13/0036/IC

Application Summary

Application Number: 13/0036/IC

Address: Priestsideroad Farm Auchentiber Road Kilmacolm PA13 4SP

Proposal: Erection of 2 No. 67 metre high (to blade tip) wind turbines

Case Officer: Guy Phillips

Customer Details

Name: Mr & Mrs Robert/Alison Beveridge

Address: West Kilbride Farm, Auchentiber Road, Kilmacolm PA13 4SN

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Comments are similar to those made in respect of Mr Connell, High Matherdock Farm, application ref: PPA-280-2011, granted on appeal 20/02/2012.

The proposed two turbines will be closer to West Kilbride Farm and Cunston Cottage than Mr Connell's. Whilst Priestsideroad Farmhouse will have its back to the turbines, they will be in full view from West Kilbride Farmhouse, forming along with Mr Connell's turbine a tight grouping within an arc of 5 degrees.

We propose to make a more detailed submission to support our objections when we have had the opportunity of examining the proposal more fully.

Mr Phillips

West Kilbride Farm
Kilmacolm
Renfrewshire
PA13 4SN

With Compliments



RECEIVED
21 FEB 2013
3603

12/0036/10

EXTRACT OF LETTER

Re: Priestside Application 13/0036/IC

Preamble:

We, Robert & Alison Beveridge, have lived at West Kilbride Farm for forty years.

For forty years we have of necessity guarded our patch against depredation. Almost immediately after purchase we had to oppose a neighbour who attempted to have a proposed SSEB very high voltage power line rerouted through our property. Not long after this we had to resist an attempt to create a forty year landfill site in the low lying area between ourselves and Auchinbothie House. Subsequently a proposal was made to quarry stone locally, and more recently Scottish Power lodged a proposal to reroute the existing Erskine/Devol Moor OHD line close by; this was followed by the now consented proposal to erect a turbine at High Mathernock. The latest threat is the proposal by Priestside to erect TWO turbines, the closer of which will be only 900 metres away while both will be on the western skyline, grouped together with High Mathernock's.

We are not, in principle against renewables, indeed we have ourselves installed solar panels. There is however a huge difference in scale between 65 metre turbines and 1 metre panels. Panels are static, domestic, visually relatively inoffensive, do not create noise, and are moderately efficient even in our damp dull climate. These turbines on the other hand are enormous, commercial, visibly obtrusive, have a high differential speed range, cause irritating flicker, are noisy, and are reputed to be less than 24% efficient.

This is a sensitive matter. We have no wish to disadvantage a neighbour of long standing, but by the same token we cannot allow any neighbour to disadvantage us. An application to install two large turbines seems excessive. As I wrote in my objection to the proposal at High Mathernock, there are other local landowners awaiting the result of this latest application with considerable interest. Priestside's advisors are already pointing to the High Mathernock decision as a template. This will make it harder to resist further proliferation.

We note that together with Cunston Cottage, we are by far most vulnerable but are unfortunate to be largely isolated with regard to the weight of our objections. In his Decision of 20th February 2012 item 11 the Reporter writes " – any future proposals would have to be assessed on their own merit including the cumulative impact with existing turbines which would place a limit on the number of turbines allowed", and item 12 "If a greater number of turbines were proposed the conclusion may be different, but I must deal with the single turbine before me".

Robert & Alison Beveridge



Landscape Statement - Landscape Setting - Comments

Para 4.6 Glasgow and Clyde Valley Landscape Assessment states inter alia that: the aim of landscape planning and management, should in order of priority, be to: Discourage the erection of additional masts or other tall structures within the hills.

Para 4.7 It is surely contentious that the proposed turbines are relatively small: at 65 metres they are small relative only to the 130 metre tall Vestas V90. They are not domestic, but commercial. The proposers note that 'an identical model has been approved for the site adjacent at High Mathernock' but do not state 'on appeal'.

Para 6.8 There is mention here of the A761 and the B788 but the road most affected namely Auchenbothie Road is not mentioned. This is a busy commuter road between the A761 and Upper Port Glasgow. See Para 6.55

Para 6.10 notes that at a range of 0-2 km a 100 metre turbine is 'likely to be a prominent feature'. Scaling this down, a 65 metre turbine at 900 metres must appear just as prominent, especially near or on the skyline.

Para 6.17 notes that for Cunston Cottage, a distance of 675m from the closest turbine, the magnitude of change is **medium**, yet this dwelling is closer than Priestside Farm itself which is shielded by the topography. The suggestion that because Cunston Cottage faces away from the turbines it is therefore not materially affected

Para 6.26 West Kilbride will experience a **HIGH** magnitude of change. This is extremely concerning. The proposed turbines including the one at High Mathernock will dominate the skyline, and create noise and flicker which will be most disturbing. (see sketch 2)

Para 6.55 This is indisputably a minor country road, but it has a high degree of commuter traffic in the mornings and evenings. It is also a much used short-cut from Port Glasgow to Kilmacolm and beyond.

Para 6.90 See Para 6.10

Para 8.6 The suggestion that uniformity and close proximity will 'reduce the effect of greater numbers of disparate developments' begs the question 'what developments? Is this in anticipation of further turbines? The suggestion that such a grouping will create the 'impression of a single larger development' is mystifying. Will it not rather create the impression of a three turbine wind farm?

Para 9.3/4 Overall Conclusions. There is a hint here of some previous submissions which seemingly took the view that this area has already suffered depredation such that further depredation is a matter of little or no consequence. This is not the case, and should not become the case. West Kilbride and Cunston Cottage will both suffer a high loss of amenity without any realistic attempt at amelioration.

"Noise Impact Assessment - Comments

Para 2. Noise Criteria.

It is noted that there are two types of noise, mechanical and aerodynamic. For a given turbine the aerodynamic or blade noise varies with rotor speed and is generally greatest at low speeds ie in slack winds when little power is being generated. Mechanical noise is a result of the gear design and is probably proportional to the rotor speed being noisiest at high speeds. Low angular velocity will produce low frequency noise whilst high speed will generate high frequency noise. At high angular velocity ie strong winds the turbine may require to be shut down. Of the two, low frequency will be the most irritating.

2.3 The Assessment and rating of Noise from Wind Farms. (fig 7). " Noise limits...should apply only to those areas frequently used for relaxation or activities for which a quiet environment is highly desirable," and "separate limits should apply for day-time and night-time, and the emphasis should be on preventing sleep disturbance". How these limits are to be applied ,and what sanctions may be available to distressed dwellings, is not clear.

Para 3.6 It is however clear from this table that West Kilbride and Cunston Cottage are to be the most inconvenienced. The presumed sound levels of the E-44 turbines would appear to be some 7% greater than the EWT DW52. This is surely significant in the choice of turbine for a quiet environment, unless there are important mitigating circumstances, which seems unlikely. It is noted that there is a large belt of deciduous trees at the rear of Priestside between the house and the turbines which will serve as a noise filter, especially in summer; there is no such belt at West Kilbride and Cunston Cottage.

Associated Infrastructure Assessment etc.

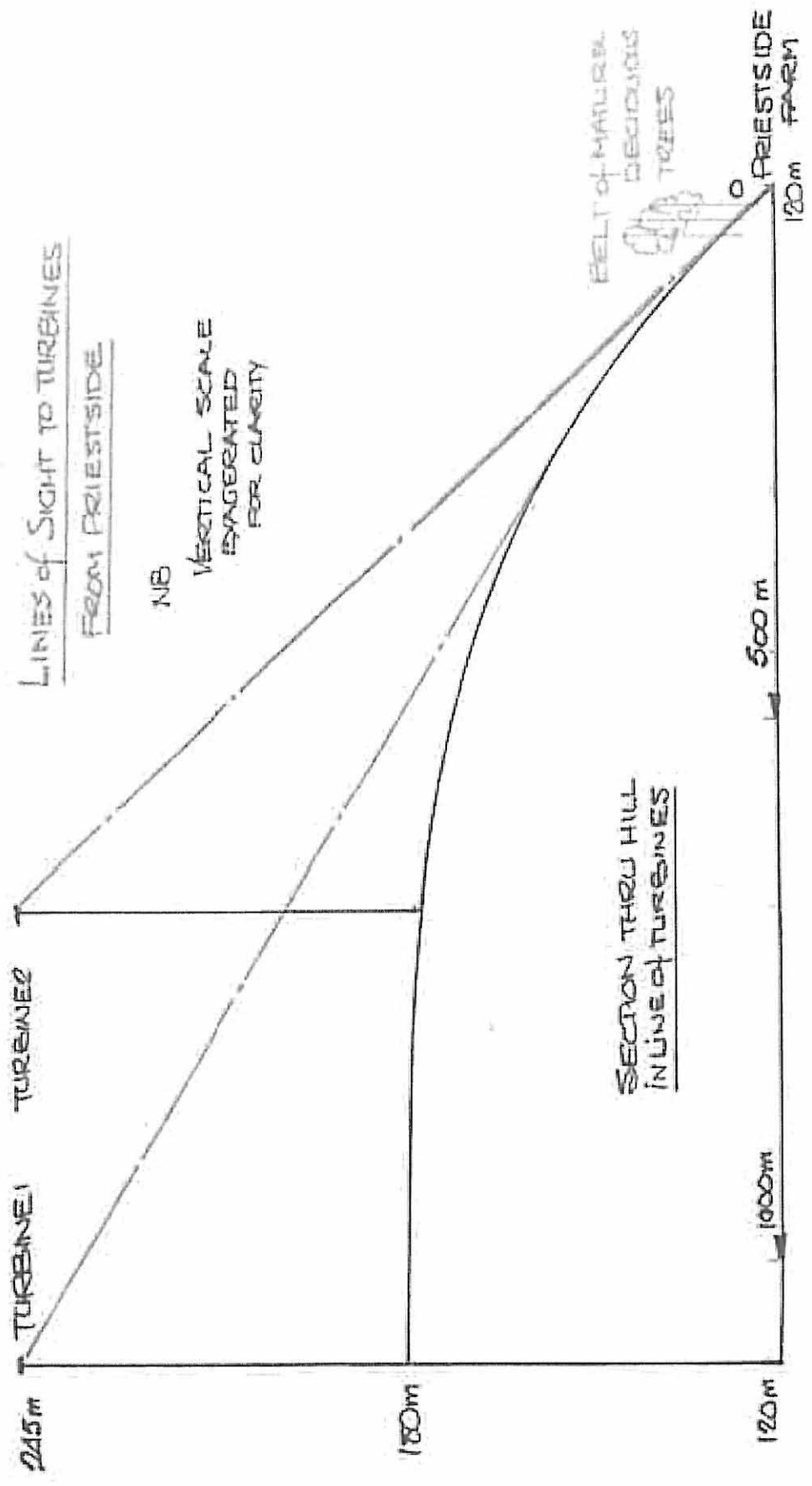
Introduction/Site History. The proposal again makes claim in regard to the consented turbine that is surely intended to influence. The advantage of three equally spaced turbines is not immediately obvious, nor is the need for a strong visual relationship between them. This is mere obfuscation. Will the average viewer, whether stationary or mobile, mark the subtle distinction between three close but randomly sited turbines and a single three turbine development? Does this not border on the risible? Viewed from the rear of Priestside, the two turbines will be almost in line and the large belt of deciduous trees mentioned above makes it highly unlikely that any of T1, and little of T2 will be visible. (see sketch 1) On the other hand (sketch2) it is obvious that from West Kilbride the two turbines will be visible in their entirety. Cunston Cottage is similarly affected.

Shadow Flicker

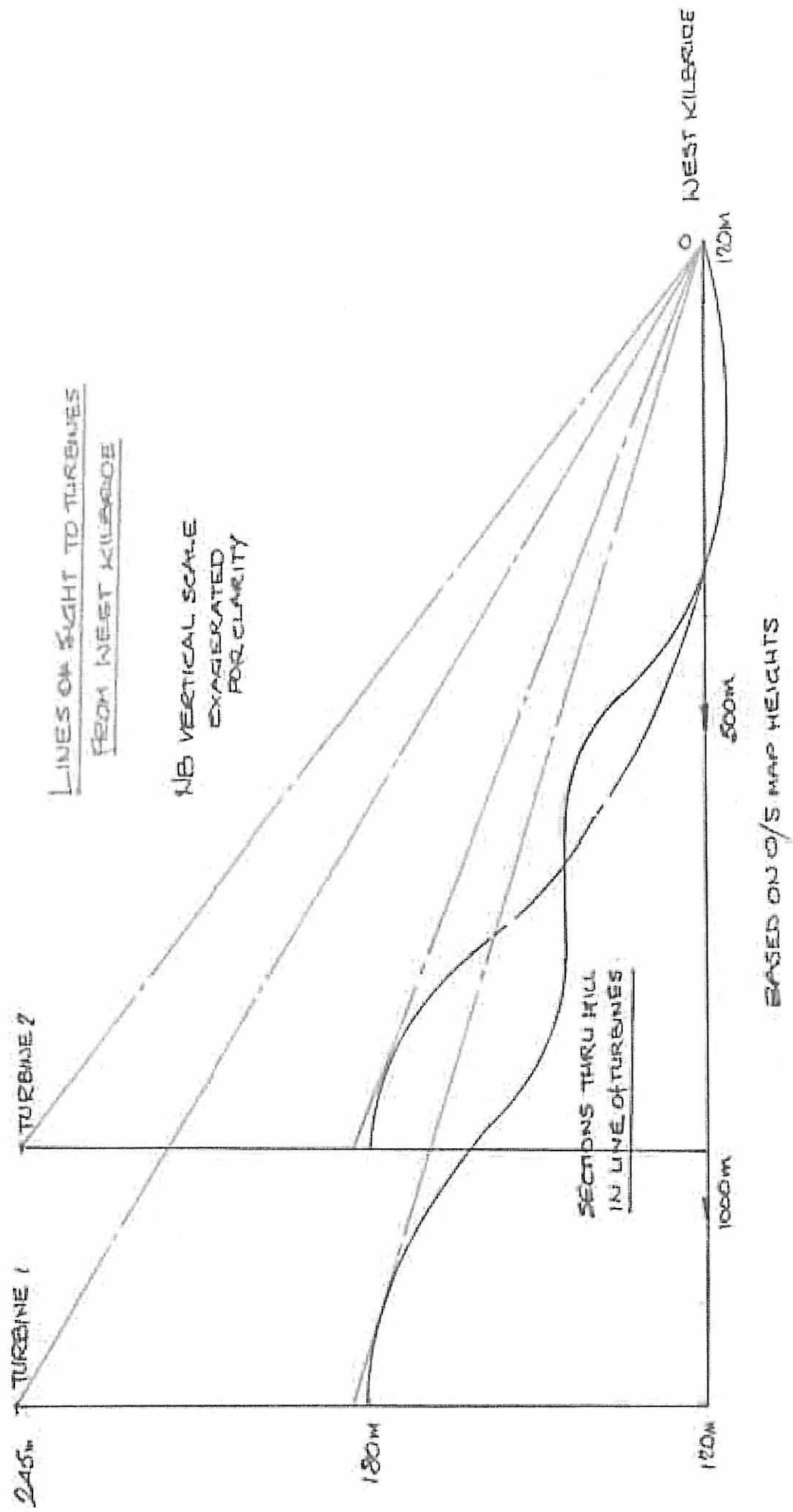
Seen from West Kilbride the mooted "three turbine development" will look somewhat as described in sketch 3. It may be that in certain directions of wind the three turbines will be operating as a "three turbine wind farm". Looking west between roughly March and April, and between September and October the sun's trajectory will see it cross through the revolving blades close to sundown. This must cause considerable flicker which may be greatly increased by the close proximity of the turbines and the possibility of their achieving rotational synchrony.

Objector's Conclusion

The Proposal for two further 65m turbines is an unmitigated disaster for the residents of West Kilbride and Cunston Cottage. It has been noted that the Beveridge family has resided at West Kilbride for forty years; the Emerson Family of Cunston Cottage has resided there for several generations. It is strongly recommended that this proposal be refused.

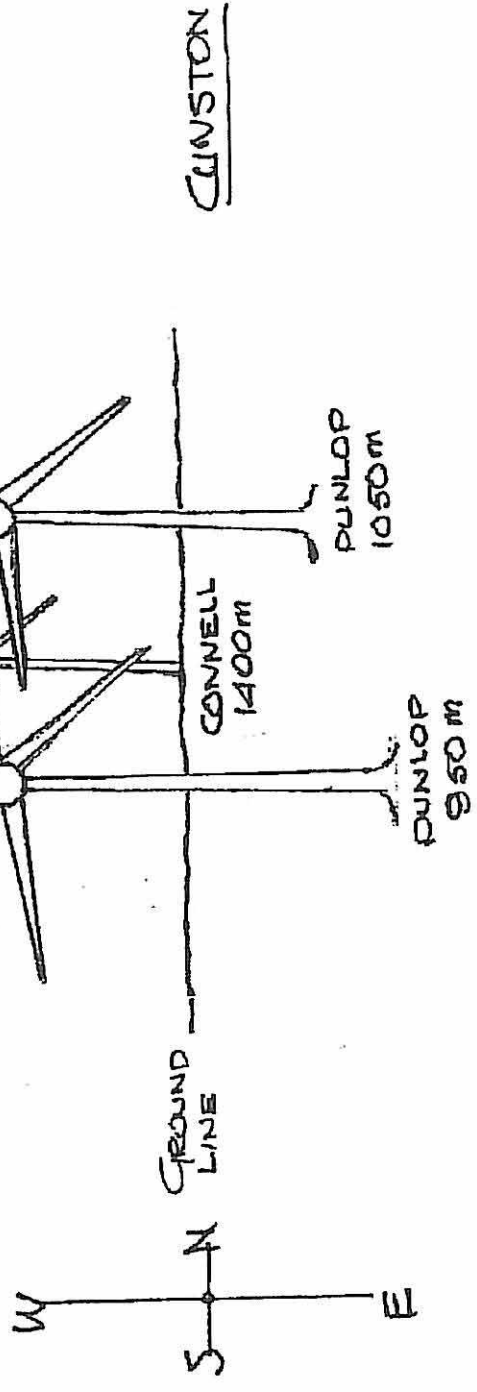


BASED ON O/S MAP HEIGHTS

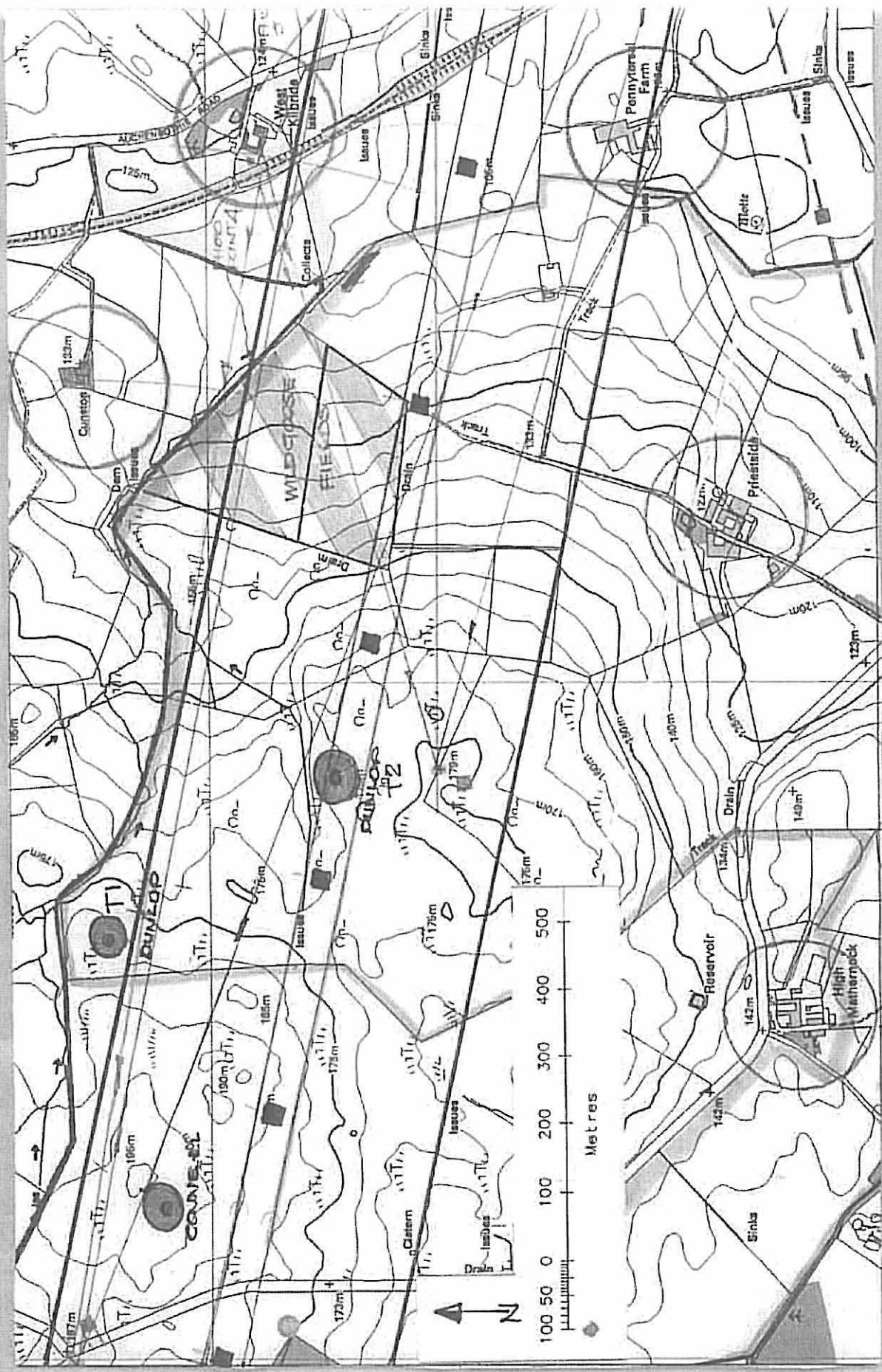


(1)

DEVELOPMENT AT HIGH MATHERNOCK - CONNELL
2 PROPOSED TURBINES AT PRIESTSIDE - DUNLOP



LOOKING WEST
VIEW FROM WEST KILBRIDE
3 TURBINES WITHIN AN ARC
of 15°



Application Comments for 13/0036/IC

Application Summary

Application Number: 13/0036/IC

Address: Priestsideroad Farm Auchentiber Road Kilmacolm PA13 4SP

Proposal: Erection of 2 No. 67 metre high (to blade tip) wind turbines

Case Officer: Guy Phillips

Customer Details

Name: Mr & Mrs Conway David & Gillian Conway

Address: Dippany Farm, Kilmacolm PA134TH

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We are very concerned about the increase in applications for wind turbines in the local area. Farmers are being targeted by companies and the financial benefits to both parties are very attractive. Renewable energy is obviously the way of the future but must not be at the cost of the local environment in which we all live. Some thought must be given to the consequences for the future and the impact the accumulative effect these turbines will have. People are encouraged more and more to go out into the countryside to follow many different pursuits. Too often it appears that little thought or concern is considered to the wider community. At present around the Kilmacolm area I believe 2 turbines have been granted and there are applications for 3 more. Surely it is important that planning take an overview of the whole area in the consideration of applications. Turbines appear to have a life span of between 20/25 years - Is any consideration given to the legacy of these which local communities will be left to face. We feel strongly that the local community as a whole are by default, through a lack of knowledge regarding new applications, going to have the local environment altered by a proliferation of such turbines. We hope our objection and comments will be given due consideration

**Guy Phillips
Planning Officer
Inverclyde Council
Municipal Buildings
Greenock PA15 1LY:**

Ronnie Emerson
Cunston Cottage
Auchenbothie Rd
Kilmacolm
PA13 4SN
Phone: [REDACTED]

13 February 2012

Notice of Objection to Planning Application 10/0036/IC Priestsie Farm Wind Turbines

Dear Sir

I am writing as a very concerned neighbour to outline my objections to the construction of two 200ft wind turbines in the close proximity of my house, Cunston Cottage.

Green Belt Development

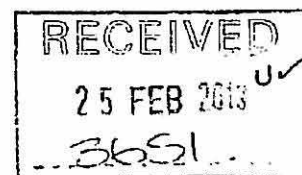
There remains a strong case that we should be separating wind turbines into two different classes:

- a) Small turbines less than 20 or so feet high which are for domestic use
- b) Large scale commercial wind farms

These developments are neither of the above types and the scale of these are not for domestic use. It also seems to contravene a further sound principal that wind turbines or any other developments should generally not be taking place in designated green belt areas. If allowed this will spoil the visual appeal of green belt areas and create an entire landscape with wind turbines dotted about in a disorganised and unplanned manner. This is not the appropriate way forward for meeting renewable energy targets.

Visual Impact

The wind turbines will be highly visible from a great distance and spoil an area of natural beauty. It will spoil the view from my dwelling and lead to a general scarring of an area of outstanding countryside. I do not want to spend the rest of my life looking out on this



visual eyesore that is in no way part of normal rural living.

Disruption During Development

In addition I have concerns that excavation works during construction of such monster turbines will seriously disrupt and contaminate the private water supply that supports my own and neighbouring homes. As well as local streams that support trout, birds, deer and other wildlife. The construction phase would also place significant stress on local roads. This could also cause damage to natural habitats and vegetation in the area.

Shadow Flicker

There is a risk that I will be subject to shadow flicker from these turbines and this could have health and well-being implications for myself and family.

Noise

As my dwelling lies approximately 650 metres north of the proposed development I am also concerned about the ongoing noise from the turbine. The prevailing south-westerly wind will carry the noise of the rotor blades in my direction. I am used to enjoying peace and tranquillity in my own home and am very concerned that these turbines will put an end to that. This may also have serious health implications which have currently been inadequately researched. I note that the estimated noise level at my home from this as per the Noise Impact Assessment are only 0.2dB below the level where a full noise impact assessment would be required and while I appreciate that this is expert professional opinion and I have no reason to question this particular assessment I will observe that there seems to be a general slipping of professional standards in recent years which unfortunately somewhat undermines all expert work these days.

Health and Safety of People and Wildlife

Wind turbines can also throw ice in winter which can be highly dangerous to walkers and wildlife. Bats and birds of prey can be particularly affected by the rotor blades.

Inappropriate Use of Public Funds

I have been further reviewing the likely progress in alternative methods of harnessing wind energy. It seems highly probable that these and all other wind turbines will be technologically obsolete within the next 5 years as much better returns and much less impact on all aspects of life will be achievable by means of utilising high altitude kites

which do not scar the landscape or cause noise pollution and will be a considerably more cost effective method of harnessing wind energy. It is a disgrace that incentives remain in place for what will soon be an obsolete method of generating energy. We should be focussing our efforts on new and economically viable methods of harnessing wind energy such as these being proposed by various global companies.

Fixed turbine wind energy is not commercially viable without the Govt subsidy which all taxpayers have to pay. These turbines are only effective at producing electricity for approximately 30% of the time unlike kites which could access the high altitude winds that are much more reliable.

Wind turbine developments also have a negative impact on the valuation of local housing and make the area less attractive for visitors. This development depreciates the value of a house which I built from scratch on a site that I've lived at all my life. This is like a personal scar on the landscape and a most unwelcome change to an area of countryside that I love and am deeply attached to.

This development also provides no real economic benefit to the local area – arguably residents affected by wind-turbine developments should be allowed to share in the benefits in the form of reduced electricity charges – however this never seems to be the case.

Yours sincerely


Ronnie Emerson

Guy Phillips

From: David Ashman on behalf of Devcont Planning
Sent: 06 March 2013 16:38
To: Grant Kennedy
Subject: FW: Kilmacolm Civic Trust Objection to Planning Application 13/0036/IC
Attachments: Priestsider Farm 67m Wind Turbines(2).pdf; Priestsider(2) Annex A.pdf; Priestsider turbine Annex B (Extract from KCT 2010 Wind turbine Paper.doc)

Follow Up Flag: Follow up
Flag Status: Completed

From: Nicol Cameron
Sent: 06 March 2013 13:01
To: Stuart Jamieson; Devcont Planning
Subject: Kilmacolm Civic Trust Objection to Planning Application 13/0036/IC

From: Mr RN Cameron (Chairman Kilmacolm Civic Trust)

To: Mr Stuart Jamieson (Head of Regeneration and Planning, Inverclyde Council)

Dear Mr Jamieson,

**KILMACOLM CIVIC TRUST OBJECTION TO PLANNING APPLICATION 13/0036/IC
(Priestson Farm Application to erect 2 x 67m high Wind Turbines)**

The Kilmacolm Civic Trust Executive Committee met at 7pm on Tuesday 5th March 2013 to consider Planning Application 13/0036/IC.

We wish to object. Our formal letter of objection is attached.

The letter consists of 3 parts: (1) Explanatory letter. (2) Annex A - supporting photographs. (3) Annex B - Extract from our position paper dated 16th December 2010.

I would be grateful if you would acknowledge receipt of all three items.

Kind Regards,

R.N. Cameron
(Chairman Kilmacolm Civic Trust)

KILMACOLM CIVIC TRUST
(Scottish Charity No SC 032744)

From:
Mr RN Cameron
Chairman Kilmacolm Civic Trust

Mr S Jamieson
Head of Regeneration and Planning
Inverclyde Council
Cathcart House
6 Cathcart Square
GREENOCK
PA15 1LS

Kaladan
Lochwinnoch Road
Kilmacolm
PA13 4DY

6th March 2013

Dear Mr Jamieson

OBJECTION TO PLANNING APPLICATION 13/0036/IC:
Priestside Farm, Auchentiber Road, Kilmacolm
(Application to erect 2 x 67m high Wind Turbines)

The Kilmacolm Civic Trust Executive Committee has considered Planning Application 13/0036/IC **and wish to object.**

The Kilmacolm Civic Trust stated its views on wind turbines in the Kilmacolm Civic Trust Position Paper attached to our letter dated 16th December 2010. Our views (*see extract attached to [this letter as Annex B](#)*) have not changed since sending you that paper.

We object to this application (13/0036/IC) for 3 key reasons:

- The visual Impact it will have.
- The Cumulative Impact.
- The Effects on 'people' i.e the residents of nearby Properties. Also, the impact on wildlife.
-

Visual Impact

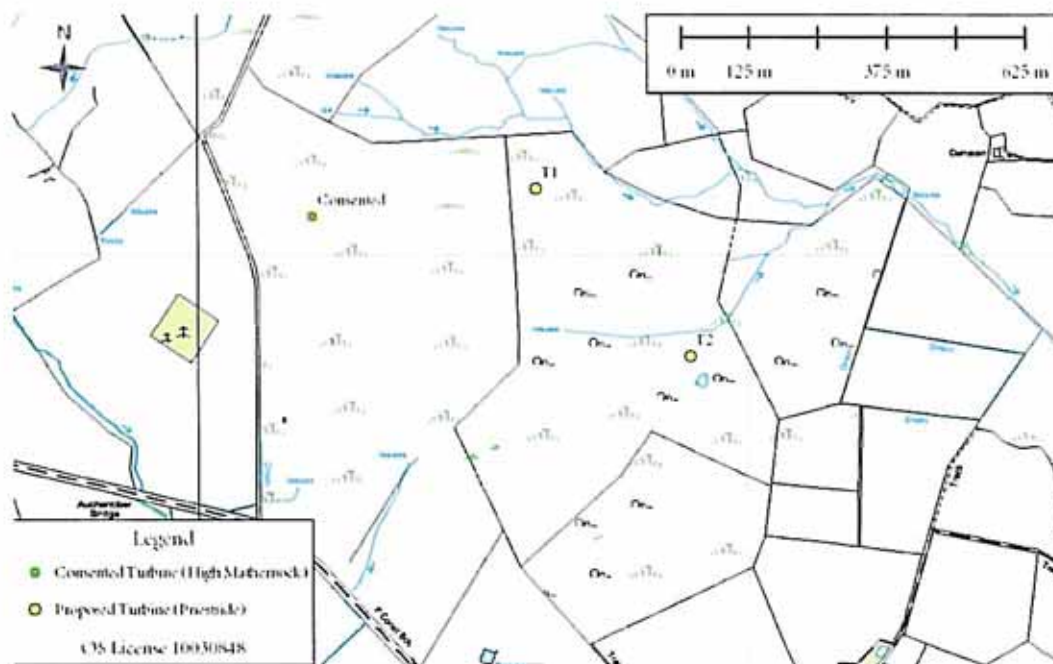
The facts and arguments presented by the agent on the visual impact that the 2 x 67m turbines would have on properties within a 2km radius and on Kilmacolm are disingenuous and dismissive of reality. They try to persuade that very few properties would be affected. This is far from the case. When we objected to the 62m (which subsequently became a 67m) high turbine to be erected at High Mathernock we pointed out that it would add to the unsightly clutter of the two 132kV and 400kV high voltage power supply lines and associated pylons that already despoil the head of the Gryfe Water Valley. We also warned that it would encourage further applications for wind turbines in the Ward 1 area, leading to wind turbine development 'creep' and in due course the creation of wind turbine farms by default. This is now happening. The consented 67m high turbine at High Mathernock Farm (which we also objected to) has led to an application for a 53.71m high turbine at Cairncurran Farm 2300m to the southwest. We objected to it (our letter dated 21st January 2013).

This application (13/0036/IC) for 2 x 67m turbines at Priestside is stated in the case presented by the agents to have a layout deliberately designed to link in with the High Mathernock 67m turbine to look like a single 3 turbine development (see the extract immediately below, and the map immediately

beneath the extract). The map shows the consented High Mathernock turbine (indicated by a green dot) and the two proposed Priestside turbines T1 and T2 (indicated by yellow dots).

The two candidate wind turbine models for the Priestside Development, are the same two candidate turbine models that were consented at High Mathernock. The Priestside Development has been positioned at equal spacing, taking into account the consented High Mathernock Development, as to allow a strong visual relationship between them, this is shown in Figure 1.

This visual relationship is addressed fully in the accompanying LVIA, where the photo-montages demonstrate that the consented High Mathernock Development and the proposed Priestside Development will appear within the landscape as a single three turbine development. It should further be noted that although two candidate wind turbine models appear in this Associated Infrastructure Assessment it is the intention of the respective landowners at High Mathernock and Priestside to construct the same turbine model. This would further contribute to the two separate developments looking like a single three turbine development within the landscape.



The Priestside buildings lie at an elevation of 110m just off Auchentiber road – a very minor road that connects with the Kilmacolm/Port Glasgow road (A761) to the east, and the back road to Greenock (B788) to the west. The house and the farm buildings are shielded from the proposed location for the 2 x 67m high (to tip of vertical blade), and the High Mathernock turbine, because they are on the reverse slope, and 60m below the crest of the Devol Moor/Craigmarloch Ridge, as are the farm buildings, house and cottage at High Mathernock. As the 2 turbines will be on the north side of and beyond the **crest line** of that part of the ridge they will indeed have very little, if any visual impact on the Priestside and High Mathernock dwellings.

However, **this is far from the case for many hundreds of dwellings lying within 2000m of the proposed turbines:**

Upper Bardrainney, Upper Park Farm, and new 4-school campus. Many houses and flats (hundreds) in upper Bardrainney and the western part of the upper Park Farm housing estates,

and the four-school campus that is now being built on the former Port Glasgow High School site in Upper Bardrainey lie **within a 2km radius** of the proposed Priestsides turbines. Because of the topography, the total 67m height (to tip of revolving blades) of the 2 x Priestsides turbines will be visible to the occupants of many of these properties and to the pupils at the 4 schools. A considerable amount of the upper portion of the High Mathernock 67m turbine, which is on much higher ground (by 20m) a little to the west, will also be seen from many of these properties. In addition, the combined impact of 3 turbines will be a constant and irritating distraction to pupils and teachers at the 4-school campus. **See photographs at Annex A.** The argument that the agents make about the direction that properties face is specious. The majority of the properties have front and rear ground floor and upper floor windows. Some have side-facing windows. The new school campus has many windows with views out towards moor where the turbines will be situated.

Cunston, and West Kilbride. These two properties lie approx 500m and 900m from the 2 x Priestsides turbine sites respectively. The two 67m Priestsides turbines and the upper portion of the 67m High Mathernock turbine will be extremely visible to both these properties. **See photographs at Annex A.** The argument that the agents make about the direction that the fronts of the properties face, and tree cover is specious. Both have rear windows and sitting-out areas. The majority of the trees are deciduous and have no leaves during the late autumn and winter period. Furthermore, a number of trees have been felled.

Pennyfersal. This property which lies just over 1km from the 2 Priestsides turbines. Although at a much lower altitude than Cunston and West Kilbride the upper portions of both turbines will be visible. The argument that the agents make about the direction that the front of the farmhouse faces and is specious.

Auchenbothie Mains House and the Auchenbothie Mains Steading development. Auchenbothie Mains house, and the old steading buildings and cottage which have been converted into 7 x dwellings, lie approx 1800m from the 2 Priestsides turbines. The 2 turbines and the upper portion of the High Mathernock turbine will be very visible from this location. The argument that the agents make about the direction that the properties face is specious. Three of the converted steading housing units face north, and the Mains House has several north facing windows. **See the photographs at Annex A.**

The Auchenbothie House housing development, and South Craigmarloch.

The Auchenbothie housing development lies 2200m south east of the 2 Priestsides turbines. It consists of Auchenbothie House (a Grade B listed building - architect William Leiper) that has been converted into flats, and some 16 detached dwellings. Most of the properties are not screened by trees. The two 67m Priestsides turbines and the 67m High Mathernock turbine will be visible from most of these properties. The whole of this development is already affected by the unsightly east/west oriented 400kV power line and associated pylons that pass only 500m to the north of it. The addition of further visual clutter and disorganisation to the landscape in the form of wind turbines will further degrade their already degraded environment. The Priestsides and High Mathernock turbines will also be visible from the property South Craigmarloch, already affected by the 400kV power line which passes directly over it. **See photographs at Annex A.**

Kilmacolm Village

Kilmacolm lies between 2 - 4 km southeast of the proposed turbine development (the centre of the village is at a distance of approx 3km).

The agents state that there will be little visual impact due to tree cover. Whilst there are indeed lots of trees, they have not taken into account the fact that very many of them are deciduous.

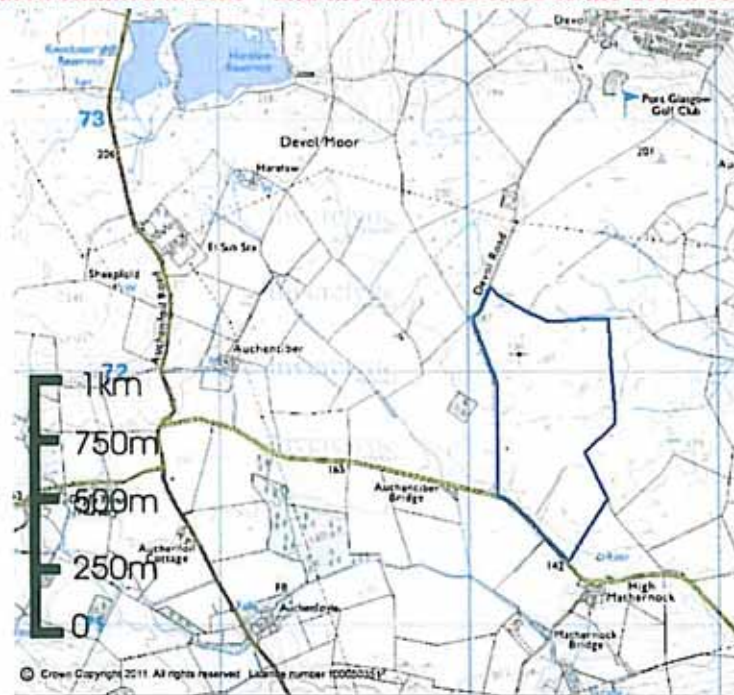
From late autumn until spring when there are no leaves the turbines will be extremely visible from large numbers of the properties in the village. **See photographs at Annex A.**

The High Mathernock Turbine

The consented application (12/0191/IC) for a **67m** tall (to tip of vertical blade) turbine with its base-plate, to be located at an altitude of 192m replaced the original (consented by Reporter on Appeal) application to erect a 330kW **62m** wind turbine which was to be erected at a lower level. We commented on application 12/0191/IC as follows: *Compared with the 10/0340/IC approved Enercon E33 330kW structure this is in effect, an increase in height of 12m. If an Enercon E44 900kW turbine is selected, with 44m rotor diameter revolving blades this new (replacement) and taller turbine at higher elevation will be even more visible and distracting to the nearby housing estates, and the pupils of the four-school campus. It will also appear as a larger and more noticeable feature in relation to the Scottish Power 132kV and 400kV transmission lines and associated pylons that run in an easterly-westerly direction across the countryside at the head of the Gryffe valley both north and south of and close to the proposed site.*

Location of the new (taller, more powerful) High Mathernock turbine (see map below).

(Notes: 1. Note the area outlined in blue - and the black dot close to the 195m contour feature)



The Cumulative Impact

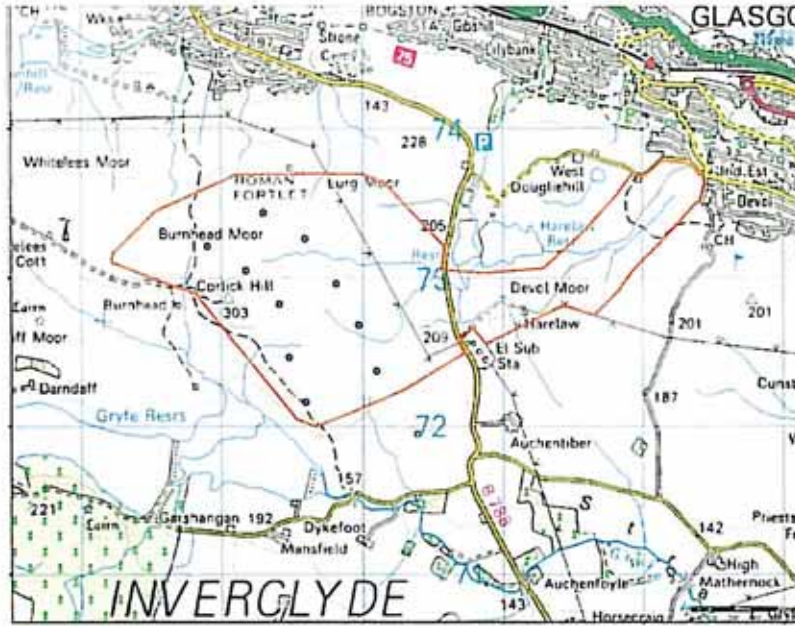
In our position paper on wind turbines in 2010 we expressed concern at the prospect of a proliferation of unrelated private turbines and the disproportionate disruptive impact that they would have. We already have turbine applications consented for (1) Dowries Farm and (2) High Mathernock Farm. There is now a formal request for a 53.71m turbine at Cairncurran which is being considered. This Priestside application is for 2 x 67m turbines on the same ridge feature as the High Mathernock turbine and only approx 500m and 750m from it.

We understand that if the Priestside application is approved an application is very likely to follow from a different party for a turbine site on high ground approx 1km to the north, in the vicinity of High Auchinleck. The combined effects will be an overlap of visual impact from the 1x High Mathernock and 2 x Priestside turbines along with the effect of noise, infrasound and amplitude modulation. Additional turbine development at High Auchinleck would compound these impacts and in effect create a small wind farm. We therefore are of the strongly held view that this application needs to be seen in the context of a developing cluster.

Furthermore, we know that consultation is now on-going for a new application to erect 10 x 110m high wind turbines on Corlic Hill and have attended a presentation by the developer. If Priestside, and then Corlic Hill were to be approved the outcome would be two windfarms approx 2km apart, introducing

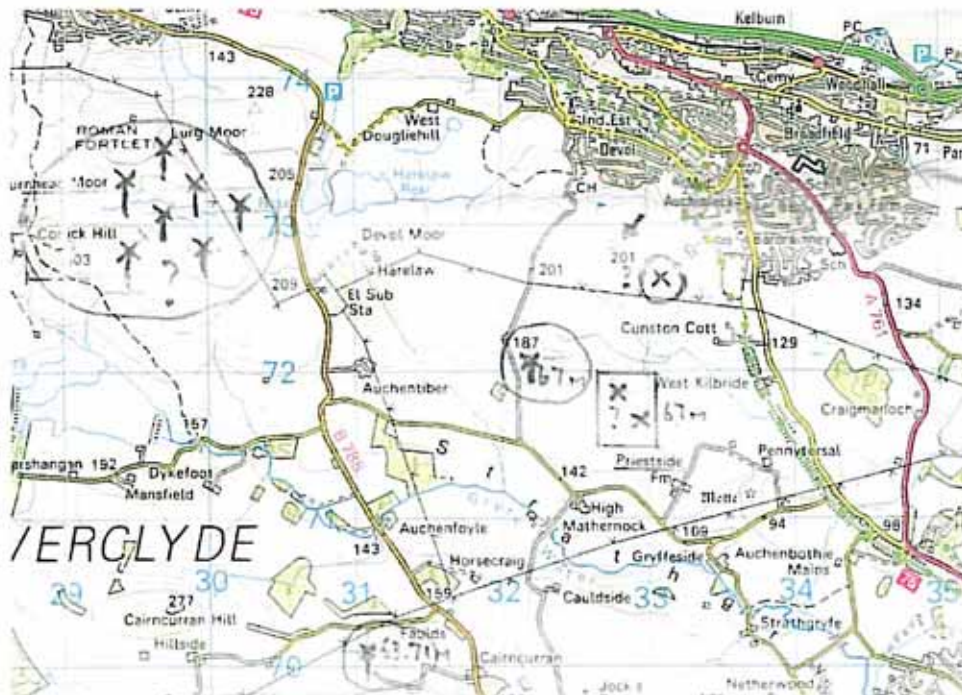
even greater visual intrusion and despoliation of the upper Gryffe Valley/Devol Moor area and further increasing the impact of noise, infrasound and amplitude modulation on residences within 2km of each of the windfarms. See the two maps below:

The Potential Corlic Hill Development



Potential Corlic Hill/High Mathernock/Cairncurran/Priestside/(and High Auchinleck?) Development

(Note: High Auchinleck is just to the east of Trig Point 201/and just west of Bardrainney)



Scottish Heritage Guidance

Guidance by Scottish Heritage on siting and designing of windfarms in the landscape (as used for turbines higher than 50 metres) emphasises the importance of avoiding confusion

5.4 When designing an individual windfarm, key design objectives should be developed as stated previously in section 4. Where cumulative impacts are likely to occur within an area, design objectives should also be established that can be consistently applied to all proposed developments. This should result in a similarity of design and windfarm image within an area that limits visual confusion, and also reinforce the perceived appropriateness of each development for its location. Cumulative design objectives should relate to ancillary infrastructure as well as wind turbines.

Additional windfarms contrast in pattern, scale and relationship to key characteristics, creating a confusing image and questioning relationship of original development to its surroundings.

The Effect of the High Mathernock and Priestside turbines

An extremely large number of dwellings within 2000m, and the 4-school campus, would be affected by visual impact, noise, infrasound and amplitude modulation intrusion.

The agents presenting the application have produced ecological, shadow flicker, safety, landscape, visual impact, and noise assessments that all conclude that:

- No matter what aspects are considered there will be minimal or negligible effects.
- Therefore installing 2 turbines at Priestside will be all right.

We consider that the arguments presented are disingenuous and do not take account of recent research:

(1) " Effects of industrial wind turbine noise on sleep and health" by Michael A Nissenbaum, Jeffery J Aramini, Christopher D Hanning" , and

(2) " Wind turbine noise, annoyance and self--reported health and well--being in different living environments" by Eja Pedersen, Kerstin Persson Waye. These studies in US, UK and Sweden show that the impact of noise of turbines is greater than previously evidenced and that the impact of noise is greater in rural areas than in suburban areas.

The US /UK study (1) printed in 'Noise and Health' found that the sound from rotating blades disrupts sleep patterns and causes stress-related conditions. Participants living near industrial wind turbines had worse sleep and found a "significant" link – probably caused by poor-quality sleep – between wind turbines and poorer mental health. Unlike some common forms of sleep - disturbing noise, such as roads, wind turbine noise varies dramatically, depending on the wind direction and speed. Unlike other forms of variable noise, however, such as railways and aircraft, it can continue for very long periods at a time. The nature of the noise — a rhythmic beating or swooshing of the blades — is also disturbing. UK planning guidance allows a night--time noise level from wind farms of 42 decibels – equivalent to the hum made by a fridge. Dr Lee Moroney, director of planning at the Renewable Energy Foundation, said: "The UK noise limits were drawn up 16 years ago, when wind turbines were less than half the current size. Worse still, the guidelines permit turbines to be built so close to houses that wind turbine noise will not infrequently be clearly audible indoors at night time, so sleep impacts and associated health effects are almost inevitable.

Effects on the Natural Heritage

The agents state that a desk study has been conducted to consider the impact on voles, badgers, newts, bats and birds. Their conclusion is that there will be no, or little impact. It is clear that although on the face of it authoritative, the material that they used to assess the impact on migratory birds is badly flawed. They fail to mention the annual congregations of very large numbers of migratory Barnacle geese which over the past 35 years have been observed by nearby local residents to stop off simultaneously for several weeks in the autumn and spring of each year (in the order of 500 – 800 birds) on 3 of the fields just west of Cunston. These fields are less than 1km from the proposed Priestside turbine sites. As an indication of how popular the area between Kilmacolm and Port

Glasgow is for migratory geese, a different type (Greylag) always stage in very large numbers in fields just (200 - 400m) to the southeast of the Park Farm housing estate.

In Conclusion

As a result of considering applications on a piecemeal, case by case basis we now have a turbine 'creep' trend developing in the Kilmacolm/Quarriers Village/and Surrounding countryside area, leading to a gradual proliferation of wind turbines.

We already have turbine applications consented for: (1) Dowries Farm. (2) High Mathernock Farm. (3) Lukeston Farm.

If the Cairncurran Farm and Priestside Farm applications are approved there is a high probability that this would encourage more applications for turbines in the Kilmacolm/Quarriers Village/Surrounding countryside area.

If the Corlic Hill and a potential High Auchinleck applications that are likely to emerge in the near future were to be approved their added effects would compound the problems and the overall detrimental impacts would be enormous.

Yours Sincerely,

Original signed

R.N. Cameron
(Chairman Kilmacolm Civic Trust)

Views from T1 Turbine marker Peg

Left: Upper Bardrainney/Park Farm. Right: Cunston



T1 67m turbine marker peg in foreground. High Mathernock 50m anemometer mast on skyline. The High Mathernock 67m turbine would be just to the left of the anemometer mast



T1 67m turbine marker peg in foreground. Middle distance: (Left)Upper Bardrainney/Park Farm, (Centre) Cunston, (Right) West Kilbride.



T1 67m marker peg in foreground. Beyond: (Left) West Kilbride. (Centre) Auchenbothie/Kilmacolm



Views from 7m above T2 67m turbine marker peg

Middle distance: Upper Bardrainney/School Campus/Park Farm; the Goose fields; Cunston



(Left): Upper Bardrainney/Park Farm and Cunston. (Right) West Kilbride



View to southeast from 8m above T2 67m marker peg

(Left): Auchenbothie House, (Centre): Kilmacolm; & Auchenbothie Mains in the green field



Views from Cycle Track

Auchenbothie House Development from the Cycle Track



Pennytersal from the cycle track (same view point as for Auchenbothie House). The T1 & T2 67m turbine ridge to rear.



Pennytersal and Cunston from The Cycle Track (the T1 and T2 67m turbine ridge is to rear of Pennytersal; the Goose Fields are to left of Cunston).

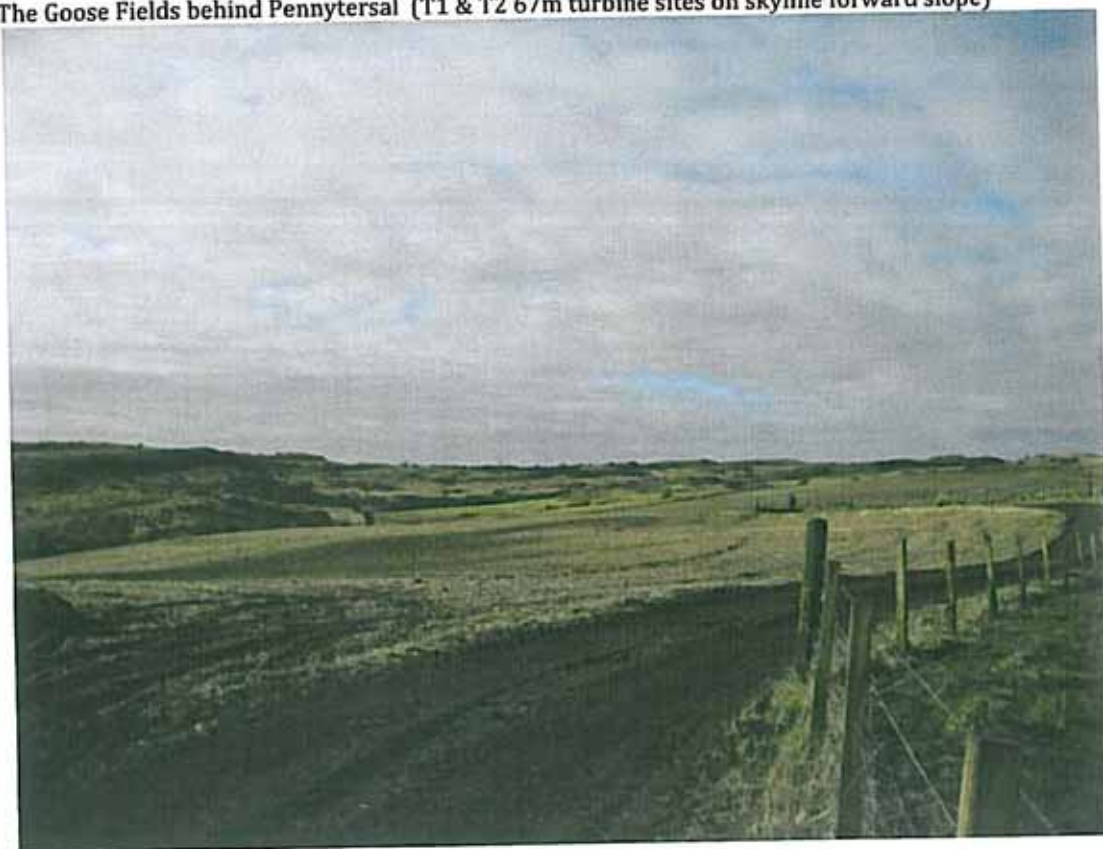


Pennytersal and the Goose Fields

Pennytersal (T2 67m turbine ridge to left rear)



The Goose Fields behind Pennytersal (T1 & T2 67m turbine sites on skyline forward slope)



Goose Fields behind Pennytersal (T1 & T2 67m turbine sites on skyline forward slope left of pylons)



Another view of the Goose Fields behind Pennytersal (right side of picture above)



**Extract From
KILMACOLM CIVIC TRUST POSITION PAPER
ON
WIND TURBINES, DOMESTIC SOLAR ENERGY, DOMESTIC AIR CONDITIONING
UNITS AND DOMESTIC HEAT EXCHANGE PUMP UNITS**

Introduction

Kilmacolm, Quarriers Village and the small settlements at Craigmearloch, Auchenbothie, Auchenbothie Mains Farm and Balrossie are situated in a very lovely rural, farmland, environment at the northern end of the Gryfe valley. The views to the west and south are the handsome ridges and valleys of the West Renfrewshire Hills and Muirshiel Regional Country Park. The outlook to the northwest and north is the ridge extending from Darndaff Moor across to Devol Moor. To the northeast and east the environment continues to be a rural farmland environment consisting of low hills, valleys and woodland, all the way to Bishopton and Houston. We treasure it. It is a peaceful and pleasant area to live in and is unspoiled by industrial intrusion except for the unsightly strings of 440kV and 132kV powerlines and their associated pylons that march across the northern part of the area on a generally east/west alignment converging on the Devol sub-station; the Pacemuir powerline that runs over Balrossie from Kilmacolm, and up the Green Water valley on a generally north/south alignment, also converging on the Devol sub-station; and the 440kV powerline that marches on a northwest alignment through Murshiel Park. All these powerlines are highly visible at all times of the year, particularly during the period October to March.

The Kilmacolm Civic Trust Constitution

The Objects of the Civic Trust are:

- To stimulate public interest in care for the beauty, history and character of the parish of Kilmacolm, its villages and their surroundings.
- To encourage the preservation, development and improvement of features of general public amenity or historic interest.
- To encourage high standards of architecture and town planning in and around Kilmacolm.
- To pursue those ends by whatever means is considered appropriate.

It is with these principles in mind that we offer our thinking on wind turbines, solar panels, air-conditioning units and heat exchange pump units. We know that you have recognised that there is an urgent need to formulate an overall strategy for Inverclyde to ensure that you are ahead of the game. We hope that what we say below will assist you as you develop your policy on these issues.

Wind Turbines

Kilmacolm and its villages lie in the heart of a designated area of Green Belt. Attempts to develop the Green Belt have been continuously and stoutly defended by Inverclyde Council and the Kilmacolm Civic Trust over the years of the Green Belt designation and it is this vigilance that has preserved the highly attractive quality of the landscape environment. Notable examples are the very vigorous campaign against the development of a Wind Farm in the area of Corlic Hill, and the very successful intervention which has persuaded SP Transmission to reconsider their initial plan to align

the upgraded 132kV power line on a new route to the south of Craigmarnoch Estate and instead find a way to align it on an east/west route just to the north of the estate.

We stated in our submission to you on the next Inverclyde Development Plan entitled 'Kilmacolm in The Future'¹ that we do not support wind farm construction in the Inverclyde Countryside, especially that visible from the villages, but instead support the national policy of such development where landscape quality, energy infrastructure and weather make such development appropriate. Areas where the introduction of wind technology is appropriate are the very large-scale wind farm developments at Whitelee.; Black Law; and offshore wind energy development (we note that the Scottish Government has recently provided £70 million for harbourside development in Scotland to facilitate offshore wind energy).

The Scottish Natural Heritage Strategic locational guidance for onshore wind farms in respect of the natural heritage March 2009 update has a series of policy plans concerning wind turbines. Map1 shows parts of Inverclyde being included in the 10Km around a National Scenic Area and also includes the **Muirshiel** Regional Park.

In respect of NSAs the policy states:

Wind farms outwith but adjacent to NSAs may have an impact upon the landscape experience within them. The range of such impacts is very variable, and depends on topography and intervisibility, landscape character and the scale of the wind farm. The potential for such impacts on the character and enjoyment of NSAs is likely to require particular consideration in the surrounding area up to 10km from the boundary of an NSA.

In locating and designing wind farms adjacent to NSAs, significant adverse impacts on their character and enjoyment should be avoided. Within an area up to around 10km from an NSA careful assessment of any effect on the NSA is required.

We would agree with the need for special care in these areas. In the case of Inverclyde, its location is especially sensitive as backdrop to the Clyde valley, as well as the views from the Argyll Hills, Arran, North Ayrshire and Lanarkshire and East Renfrewshire looking across Inverclyde to Argyll, Ben Lomand, Arran etc. In other words developments within Inverclyde impact on perspectives from outwith the area.

The policy says in respect of Regional Parks:

Local authorities are encouraged to safeguard countryside which contributes to existing and predicted future recreation needs. Regional Parks play a valuable role in providing opportunities for urban populations to gain access to attractive areas of countryside for recreation and enjoyment. Planning Authorities should use appropriate criteria to ensure that proposals satisfactorily address any impacts on the particular interest that a regional designation is intended to protect.

We are also mindful that the policy needs to be shaped to take into account the cumulative impact of turbines. If four separate, but nearby applications for Enercon E-33s, a medium sized 3-blade wind turbine rated at 330kW as proposed at High Mathernock and likely as an application in due course at Priestside farm were submitted they would be seen as single applications whereas, because of their close proximity, they would have a cumulative effect and would form a discordant and confused development. Each application, whether for one or multi turbines, needs to be considered for the potential cumulative impact. As such we object to the development of single or small clumps of turbines or large scale wind farms.

Wind Farms. It is our view that any renewed attempts by energy developers to introduce wind farms into any part of Muirshiel Regional Country Park, or on any part of the high moorland ridges that

¹ Inverclyde Development Plan: Kilmacolm In The Future, dated 31st August 2010.

extend eastwards from the park and separate Kilmacolm from Greenock and Port Glasgow should be resisted strongly. Forests of the massive wind turbines that such developments would entail would destroy the beauty and enjoyment of the immediate areas, and would detract from the overall beauty of the Clyde Valley when viewed from the North, south, east or west. There would also be potential conflict with wildlife, such as the Hen Harriers which breed each year in a recognised Special Protection Area in Muirshiel Park when they come back from their winter sojourn in warmer climates.

Private Single Turbines. We take a similar view with regard to the introduction of single turbines on privately owned high ground. Although it is Government Policy to encourage private landowners to install smaller capacity wind turbines on their land, through financial incentive, and manufacturers are very keen to exploit this policy (and are attempting to do so) it is not appropriate for four reasons:

- There is no benefit to the local communities.
- They make very little contribution to the overall national target (A single E-33 turbine adds less than 1/6000th to current Scottish wind generated capacity; less than 1/20000th to renewable current, being built and consented; and even less as a proportion of the 2020 target for electricity generation in Scotland).
- Single turbines will not have any positive effects on the economy, other than to the personal benefit of the applicants.
- More importantly, landowners with high ground on their properties suitable for wind turbines will take advantage of the Government's policy and in a very short while, unless resisted, there will be a rash of such developments and the beauty of the upper Gryfe valley countryside will be disfigured with large numbers of 200ft E-33 wind turbines (wind farm development by stealth for little benefit). This is happening in our area already: High Mathernock, Priestside, Dowries. There is no doubt that more applications will follow: not only from applicants within Ward 1; but also from applicants in Renfrewshire with high ground in the countryside that extends eastwards of the general line Finlaystone, Kilmacolm, Bridge of Weir.

We recommend that there should be a very clear policy on private single turbines. We further recommend that this should be based on height and visual intrusion/noise factors. A single stand-alone E-33 turbine, standing 200ft tall from base to vertical height of blade, is a very considerable visual intrusion. Several private turbines of that type in one general area such as Devol Moor, or Balrossie Ridge, would be highly intrusive (visual and noise). Any turbine standing even 100ft tall would be equally intrusive: the pylons of the already existing 440kv power lines that converge on Devol sub-station are that height. Even a turbine standing 50ft tall would be potentially intrusive unless situated in a screened area such as the one proposed by the applicant at Wemyss Bay (10/0282/IC).

R.N. Cameron

RN Cameron (Chairman Kilmacolm Civic Trust)

Application Comments for 13/0036/IC

Application Summary

Application Number: 13/0036/IC

Address: Priestsider Farm Auchentiber Road Kilmacolm PA13 4SP

Proposal: Erection of 2 No. 67 metre high (to blade tip) wind turbines

Case Officer: Guy Phillips

Customer Details

Name: Mrs Ann Kennedy

Address: Lawpark, Lochwinnoch Road, Kilmacolm PA13 4TA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this application on the grounds that there is a potential for a undesirable cumulative impact on the environment. The tearing up of ground in order to build the foundation for wind turbines is in fact releasing CO2 and as turbines are only 25% efficient it seems a nonsense to grant permission for two such very tall structures

DECISION NOTICE DATED 23 APRIL 2013

DECISION NOTICE

Inverclyde
council

Refusal of Planning Permission

Issued under Delegated Powers

Regeneration and Planning
6 Cathcart Square
Greenock
PA15 1LS

Planning Ref: 13/0036/IC

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(SCOTLAND) REGULATIONS 2008

Gordon Dunlop
Priestside Farm
Auchentiber Road
Kilmacolm
PA13 4SP

Bryce Boyd Planning Solutions
Ellersleigh
Castlehill Road
KILMACOLM
PA13 4EL

With reference to your application dated 4th February 2013 for planning permission under the above mentioned Act and Regulation for the following development:-

Erection of 2 No. 67 metre high (to blade tip) wind turbines at

Priestside Farm, Auchentiber Road, Kilmacolm

Category of Application: Local Application Development

The INVERCLYDE COUNCIL in exercise of their powers under the abovementioned Act and Regulation hereby refuse planning permission for the said development.

The reason for the Council's decision is:-

1. The height and scale of the proposed turbines and their proximity to the wind turbine granted planning permission at High Mathernock, nearby housing, Auchentiber Road, Auchenbothie Road, the B788, Kilmacolm village and the eastern part of upper Port Glasgow have a cumulative impact in creating an unexpected and dominant collective feature in this part of the Inverclyde countryside to the detriment of visual amenity and landscape character and thus contrary to:
 - a. Policy UT6 of the Inverclyde Local Plan, criterion (b) which requires regard to be given to the landscape, especially when viewed from major transport corridors.
 - b. Interim Inverclyde Local Plan Policy UT6A, criterion (c) which requires turbines to be sited within the landform to ensure that they do not have a detrimental effect on the landscape and wider environment.
 - c. Interim Inverclyde Local Plan Policy UT6B, criterion (f) which requires regard to be given to the landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements and when set against the skyline.

The reason why the Council made this decision is explained in the attached Report of Handling

Dated this 23rd day of April 2013

Head of Regeneration and Planning



- 1 If the applicant is aggrieved by the decision of the Planning Authority to refuse permission for or approval required by condition in respect of the proposed development, or to grant permission or approval subject to conditions, he may seek a review of the decision within three months beginning with the date of this notice. The request for review shall be addressed to The Head of Legal and Administration, Inverclyde Council, Municipal Buildings, Greenock, PA15 1LY.

- 2 If permission to develop land is refused or granted subject to conditions, and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the planning authority a purchase notice requiring the purchase of his interest in the land in accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997

Refused Plans: Can be viewed Online at <http://planning.inverclyde.gov.uk/Online/>

Drawing No:	Version:	Dated:
01		01.02.2013
02		01.02.2013
03		01.02.2013
04		01.02.2013
05		01.02.2013
06		01.02.2013

**NOTICE OF REVIEW FORM AND
SUPPORTING DOCUMENTS**



Head of Legal & Democratic Services
Inverclyde Council
Municipal Buildings
Greenock
PA15 1LY

16 July 2013



Dear Sirs

**NOTICE OF REVIEW SUBMISSION
PLANNING REFUSAL - GORDON DUNLOP
ERECTION OF TWO WIND TURBINES (ENERCON E44) AT PRIESTSIDE
FARM AUCHENTIBER ROAD KILMACOLM
REF: 13/0036/IC**

I refer to the above planning application which was refused planning permission by the Head of Regeneration & Planning on 23 April 2013.

I now attach for your attention a Notice of Review Submission on behalf of my client, Gordon Dunlop.

Please do not hesitate to contact me if you require any further information or clarification at this time

Yours sincerely

J BRYCE BOYD

NOTICE OF REVIEW

UNDER SECTION 43A(8) OF THE TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997 (AS AMENDED) IN RESPECT OF DECISIONS ON LOCAL DEVELOPMENTS

THE TOWN AND COUNTRY PLANNING (SCHEMES OF DELEGATION AND LOCAL REVIEW PROCEDURE) (SCOTLAND) REGULATIONS 2013

THE TOWN AND COUNTRY PLANNING (APPEALS) (SCOTLAND) REGULATIONS 2013

IMPORTANT: Please read and follow the guidance notes provided when completing this form. Failure to supply all the relevant information could invalidate your notice of review.

Use **BLOCK CAPITALS** if completing in manuscript

Applicant(s)

Name

Address

Postcode

Contact Telephone 1

Contact Telephone 2

Fax No

E-mail*

Agent (if any)

Name

Address

Postcode

Contact Telephone 1

Contact Telephone 2

Fax No

E-mail*

Mark this box to confirm all contact should be through this representative:

* Do you agree to correspondence regarding your review being sent by e-mail?

Yes No

Planning authority

Planning authority's application reference number

Site address

Description of proposed development

Date of application Date of decision (if any)

Note. This notice must be served on the planning authority within three months of the date of the decision notice or from the date of expiry of the period allowed for determining the application.

Nature of application

- 1. Application for planning permission (including householder application)
- 2. Application for planning permission in principle
- 3. Further application (including development that has not yet commenced and where a time limit has been imposed; renewal of planning permission; and/or modification, variation or removal of a planning condition)
- 4. Application for approval of matters specified in conditions

Reasons for seeking review

- 1. Refusal of application by appointed officer
- 2. Failure by appointed officer to determine the application within the period allowed for determination of the application
- 3. Conditions imposed on consent by appointed officer

Review procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Please indicate what procedure (or combination of procedures) you think is most appropriate for the handling of your review. You may tick more than one box if you wish the review to be conducted by a combination of procedures.

- 1. Further written submissions
- 2. One or more hearing sessions
- 3. Site inspection
- 4. Assessment of review documents only, with no further procedure

If you have marked box 1 or 2, please explain here which of the matters (as set out in your statement below) you believe ought to be subject of that procedure, and why you consider further submissions or a hearing are necessary:

Site inspection

In the event that the Local Review Body decides to inspect the review site, in your opinion:

- | | Yes | No |
|--|-------------------------------------|-------------------------------------|
| 1. Can the site be viewed entirely from public land? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. Is it possible for the site to be accessed safely, and without barriers to entry? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

If there are reasons why you think the Local Review Body would be unable to undertake an unaccompanied site inspection, please explain here:

Statement

You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. Note: you may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

If the Local Review Body issues a notice requesting further information from any other person or body, you will have a period of 14 days in which to comment on any additional matter which has been raised by that person or body.

State here the reasons for your notice of review and all matters you wish to raise. If necessary, this can be continued or provided in full in a separate document. You may also submit additional documentation with this form.

SEE ATTACHED GROUNDS OF NOTICE OF REVIEW

Have you raised any matters which were not before the appointed officer at the time the determination on your application was made?

Yes No

If yes, you should explain in the box below, why you are raising new material, why it was not raised with the appointed officer before your application was determined and why you consider it should now be considered in your review.

List of documents and evidence

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review.

SEE ATTACHED NOTICE OF REVIEW INCLUDING PRODUCTIONS AND REFERENCES

Note. The planning authority will make a copy of the notice of review, the review documents and any notice of the procedure of the review available for inspection at an office of the planning authority until such time as the review is determined. It may also be available on the planning authority website.

Checklist

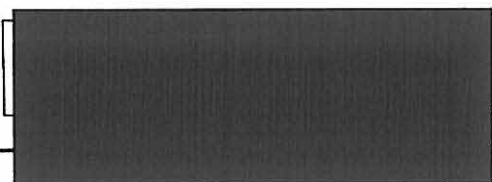
Please mark the appropriate boxes to confirm you have provided all supporting documents and evidence relevant to your review:

- Full completion of all parts of this form
- Statement of your reasons for requiring a review
- All documents, materials and evidence which you intend to rely on (e.g. plans and drawings or other documents) which are now the subject of this review.

Note. Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice from that earlier consent.

Declaration

I the applicant/agent [delete as appropriate] hereby serve notice on the planning authority to review the application as set out on this form and in the supporting documents.

Signed  Date



TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997

GROUNDS OF NOTICE OF REVIEW

**SUBMISSION AGAINST REFUSAL OF PLANNING
PERMISSION BY INVERCLYDE COUNCIL FOR THE
ERECTION OF TWO 67 METRE WIND TURBINES AT
PRIESTSIDE, KILMACOLM.**

REF: 13/0036/IC

JULY 2013

TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997

GROUNDS OF NOTICE OF REVIEW

SUBMISSION AGAINST REFUSAL OF PLANNING PERMISSION BY INVERCLYDE COUNCIL FOR THE ERECTION OF TWO 67 METRE WIND TURBINES AT PRIESTSIDE, KILMACOLM.

REF: 13/0036/IC

BACKGROUND

The planning application was submitted on 4 February 2013.

On 23 April 2013, using delegated powers the Head of Regeneration & Planning refused planning permission on the following grounds:

1. The height and scale of the proposed turbines and their proximity to the wind turbine granted planning permission at High Mathernock, nearby housing, Auchentiber Road, Auchenbothie Road, the B788, Kilmacolm Village and the eastern part of Upper Port Glasgow have a cumulative impact in creating an unexpected and dominant collective feature in this part of the Inverclyde countryside to the detriment of visual amenity and landscape character and thus contrary to:
 - a. Policy UT6 of the Inverclyde Local Plan, criterion (b) which requires regard to be given to the landscape, especially when viewed from major transport corridors.
 - b. Interim Inverclyde Local Plan Policy UT6A, criterion (c) which requires turbines to be sited within the landform to ensure that they do not have a detrimental effect on the landscape and wider environment.
 - c. Interim Inverclyde Local Plan Policy UT6B, criterion (f) which requires regard to be given to the landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements and when set against the skyline.

The Report of Handling, issued by the Head of Regeneration & Planning, dated 18 April 2013, details his analysis of the proposal and outlines the reasons for arriving at the decision.

Production 1 - Report of Handling

GROUNDS OF REVIEW

Section 37(2), Town and Country Planning (Scotland) Act 1997 provides that in determining an application regard shall be given to the development plan so far as material to the application and to any material considerations. Section 25(1) provides that determination shall be made in accordance with the development plan unless material considerations indicate otherwise.

In refusing planning permission the planning officials have indicated the proposal does not accord with Policies, UT6 (b), UT6A (c) and UT6B (f).

It is submitted that planning officials have over emphasised the impact on visual amenity and landscape character, not fully considered National Planning Policy, and not fully analysed their own Policy UT6.

When National Planning Policy is considered, and objectively analysed against constraints outlined in Policy UT6, Priestside is one of an extremely limited number of locations on which wind turbines of this scale could be located in Inverclyde. Furthermore the cumulative impact is lower in magnitude than suggested in the Report of Handling.

Production 2 - Landscape Statement

OBJECTIVE ANALYSIS OF PROPOSAL

The Report of Handling concedes no objections were received from statutory consultees.

The Report also confirms Scottish Planning Policy is supportive of renewable energy developments and individual planning authorities should support such developments where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed.

Regarding Public Consultation, four households and the Kilmacolm Civic Trust objected. Only their comments relating to visual impact have relevance to the grounds for refusal, all other points raised are either dismissed in the Report of Handling, or not considered planning issues. This low level of objection indicates little local opposition.

Inverclyde Council refused planning application 10/0340/JC, for the Erection of a Wind Turbine on the adjoining field at High Mathernock in September 2011 on the following grounds:

1. A combination of height and scale, proximity to public roads (including Auchentiber Road, designated as a Core Footpath to encourage the public into the countryside), proximity to residential properties and visual prominence from Kilmacolm, combine to create a dominant and excessively prominent feature in this part of Inverclyde's countryside, contrary to:-
 - a. the Council's interim policy on Small Wind Turbine Development UT6B, criteria (a) and (f).
 - b. the Council's interim policy on Wind Farms UT6A criterion (c); and
 - c. Policy UT6 of the Inverclyde Local Plan, criteria (a), (b) and (c).

These grounds are broadly similar to the current application. The wind turbine at High Mathernock was successfully appealed at the DPEA, where the Reporter concluded;

'the proposal accords with the broad spirit, if not the exact letter of the development plan.'

Production 3 - Reporter's Decision Letter

The Report of Handling makes reference to a single line from the Reporter's Decision Letter where the Reporter indicates,

'If a greater number of turbines were proposed the conclusions may be different.'

The Reporter does not state; it **would** have been different.

It is unfortunate the Report of Handling doesn't refer to other comments of the Reporter, where in paragraph 12, discussing specifically Policy UT6 (b), which are the grounds of refusal of this current application, the Reporter indicates:

'its impact when seen from that area (upper Port Glasgow), particularly from Bardrainey, would not be so significant, within the overall scale of the landscape, as to justify refusal of the development. I reach the same conclusion with respect of Kilmacolm, and other settlements in the surrounding area.'

Further in paragraph 13, while still discussing Policy UT6 (b) the Reporter indicates:

'In this case, and based on my experience of similar turbines elsewhere, the impact from a distance would be subdued within the scale of the wider landscape. Taking all these considerations together, I find that the visual impact of the proposed turbine would not be so significant as to justify refusal. Therefore there is no overriding conflict with criterion (b).'

The accompanying Landscape Statement demonstrates the vast majority of Inverclyde's residents will have no views of the turbines from their houses. The turbines would be theoretically visible from some rural dwellings, upper Port Glasgow and Kilmacolm but it is recognized, in the Landscape Statement, that views from these places will be rare due to visual screening from buildings and vegetation. The Reporter indicated: 'the impact would not be so significant as to justify refusal.'

Additionally in paragraph 13, while still discussing Policy UT6 (b), the Reporter noted the large number of pylons in the area:

'many of which are particularly prominent... it does mean that the turbine would not be the only feature drawing the eye from viewpoints in the area.'

The countryside surrounding Priestside has a high degree of industrialised clutter with Devol Moor sub-station and associated pylon lines, it is submitted if turbines are to be developed in Inverclyde it makes perfect sense to start in a location where the landscape is already degraded, rather than disturb the unspoilt areas of Clyde Muirshiel Regional Park. This view is endorsed by Inverclyde's SPG^[1] that states:

'Clyde Muirshiel Regional Park and West Renfrew Hills are of such landscape and recreational importance that they too are excluded as the siting of large wind farm developments within these areas would not be compatible with their strategic recreational and environmental assets.'

Finally in paragraph 8 of the Decision Letter, with regard to turbine scale, the Reporter indicates:

'the proposed turbine is medium scale (67 metres in height) compared to the large turbines used for major windfarms, which can now exceed 130 metres in height.'

This view is endorsed in the Report of Handling that states:

'there are wind turbines elsewhere throughout Scotland which are significantly higher than that proposed'

The grounds issued by the planning officials indicate the application was refused owing to the cumulative impact of the proposal.

Regarding cumulative impact, the main grounds for refusal, the accompanying Landscape Statement concludes:

'The combination of this (the approved wind turbine at High Mathernock) and the proposed turbines would elevate the level of cumulative impact within the area but their uniformity and close proximity will reduce the effect of greater numbers of disparate developments and create the impression of a single larger development. This would be a preferable option for further wind turbine development in this area as it would maintain the impression of a single uniform development rather than wide spread and mismatching developments in future.'

This view accords with SNH Guidance ^[2] on the matter:

'Where cumulative impacts are likely to occur within an area, design objectives should also be established that can be consistently applied to all proposed developments. This should result in a similarity of design and wind farm image within an area that limits visual confusion.'

The two turbines proposed at Priestside and the one consented at High Mathernock are identical turbine models, equal spaced in a coherent pattern and would appear as a symmetrical three turbine development. It is submitted that this is preferential to widespread and mismatching developments over a wider area, which also accords with the SNH Guidance. The appellant cannot understand how the Report of Handling dismisses this point.

One area where there has been no analysis by the planning officials is wind speed. Inverclyde's SPG ^[3] states:

'Wind speed is a primary determinant of where wind farms can go. If there is no consistent exposure to prevailing winds there is no point in locating a wind farm'

To work effectively, wind turbines need exposure from all directions, this requires siting in open areas; which inevitably leads to some degree of visual impact. The conclusion of the Council's analysis is that it is unreasonable to think wind turbines can be placed in locations with 'consistent exposure to prevailing winds' and not have some degree of visual impact on the surroundings.

The Landscape Statement concedes that two wind turbines will have an impact on the landscape, however the impact is in keeping with other wind turbine developments in Scotland and the cumulative effect would be limited when seen as a grouping with the previously approved turbine. It is therefore submitted that this is not sufficient to justify refusal.

SUPPORTING INFORMATION

Inverclyde Council have approved numerous small (under 50m) wind turbines, while refusing every application for wind turbines (over 50m), as demonstrated Figures 1 & 2.

Figure 1

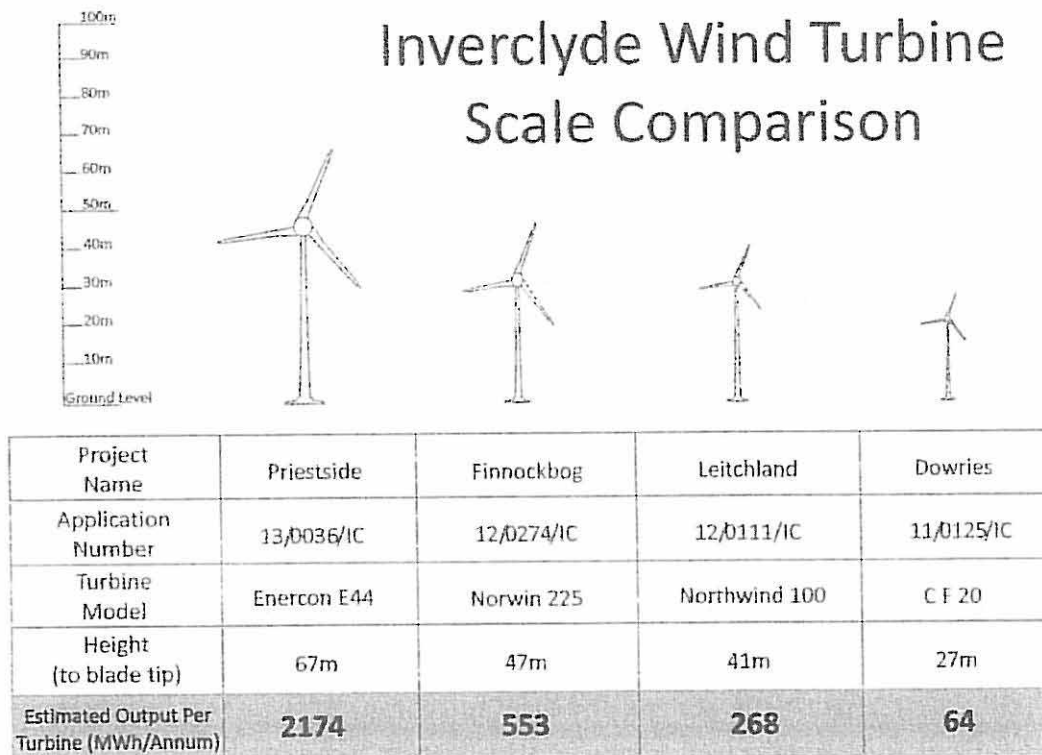
Application	Submission Date	Height to Blade Tip (m)	Number of Turbines	Decision
Inverclyde Academy, Greenock, PA16 0FB	School Application	45	1	Approved
IC/07/292, Whitehouse Products, Port Glasgow, PA14 6TD	August 2007	25	1	Approved (Delegated)
11/0125/IC, Dowries, Greenock, PA16 9LU	May 2011	27	1	Approved (Delegated)
11/0209/IC, Murdieston, Greenock, PA16 9LJ	August 2011	22	2	Approved (Planning Board)
11/0235/IC, Kelly Mains, Wemyss Bay, PA18 6AZ	September 2011	34	1	Approved (Delegated)
11/0290/IC, Cornalees, Inverkip, PA16 9LX	October 2011	27	1	Approved (Delegated)
11/0331/IC, Underheugh, Ardgowan Estate, Gourock	December 2011	27	3	Approved (Delegated)
12/0085/IC, Kellybank Cottage, Wemyss Bay, PA18 6BB	March 2012	33	2	Refused (Delegated) LRB Appeal (Dismissed)
12/0099/IC, Lukeston, Bridge of Weir, PA11 3SJ	March 2012	47	1	Approved (Delegated)
12/0111/IC, Leitchland, Greenock, PA16 0AD	March 2012	41	1	Approved (Delegated)
12/0133/IC, Faulds Park, Gourock,	April 2012	34	2	Refused (Delegated) LRB Appeal (Dismissed)
12/0274/IC, Finnochbog, Inverkip, PA16 0DA	September 2012	47	2	Approved (Delegated)
12/0286/IC, Shielhill, Inverkip, PA16 9NB	September 2012	34	1	Refused (Planning Board) DPEA Appeal (Approved)
13/0077/IC, Kelly Mains, Wemyss Bay, PA18 6AZ	March 2013	42	1	Refused (Planning Board)

Figure 2

Application	Submission Date	Height to Blade Tip (m)	Number of Turbines	Decision
Corlie Hill, Greenock	May 2003	100	22	Section 36 (Refused) Public Inquiry (Dismissed)
IC/06/231, Leapmoor Forest, Inverkip	July 2006	125	10	Application Withdrawn
10/0340/IC, High Mathernock, Kilmacollm, PA13 4SP	October 2010	61	1	Refused (Planning Board) DPEA Appeal (Granted)
12/0357/IC, Carincurran, Kilmacollm, PA13 4TH	December 2012	53	1	Refused (Delegated) Current: LRB Appeal
13/0036/IC, Priestside, Kilmacollm, PA13 4SP	January 2013	67	2	Refused (Delegated) Current: LRB Appeal

Inverclyde Council appear to have an unofficial policy of approving most turbines under 50m, while refusing all turbines over 50m. The appellant suggests this approach is misguided as it produces only a limited amount of electricity from Inverclyde's renewable resources. Wind turbine output is proportional to the swept area of the turbines blades. As a squared law, a modest increase in rotor diameter, leads to a large increase in swept area and accordingly, turbine output. The effect of this on different developments in Inverclyde is demonstrated in Figure 3. ¹⁴⁾

Figure 3



To put this difference in output into a local context, the four developments in Figure 3 are compared to the electrical requirements of Kilmacolm in Figure 4.¹⁵⁾

Figure 4

Project Name	Priestside & High Mathernoch (3 x Enercon E44)	Finnochbog (2 x Norwin 225)	Leitchland (1 x Northwind 100)	Dowries (1 x CF20)
Percentage of Kilmacolm's Electrical Demand Satisfied	116%	19%	4.7%	1.1%

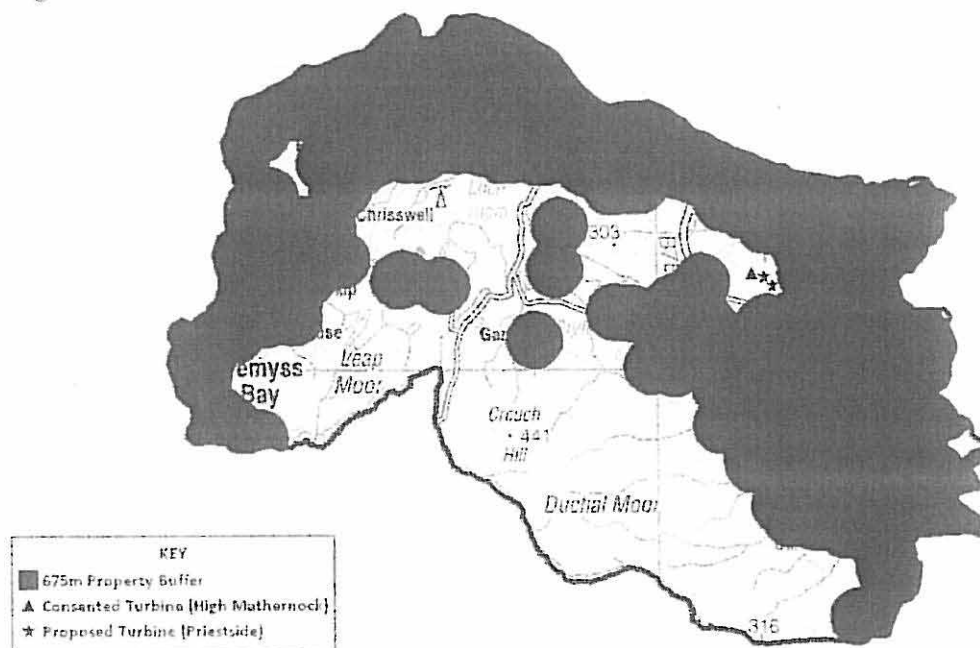
If Inverclyde Council are serious about contributing to the Scottish Government's target of 80% of Scotland's electricity from renewable resources by 2020,¹⁶⁾ then wind turbines over 50m will require to be approved. This leads to the question; where can turbines over 50m be accommodated in Inverclyde?

To answer this question a study of the basic factors restricting development of wind turbines over 50m was undertaken. An important aspect in the consideration of any turbine application is three constraints contained in Policy UT6:

- (c) residential amenity;
- (d) tourism and leisure resources, particularly if within the Clyde Muirshiel Regional Park;
- (e) the operation of aircraft and telecommunications equipment.

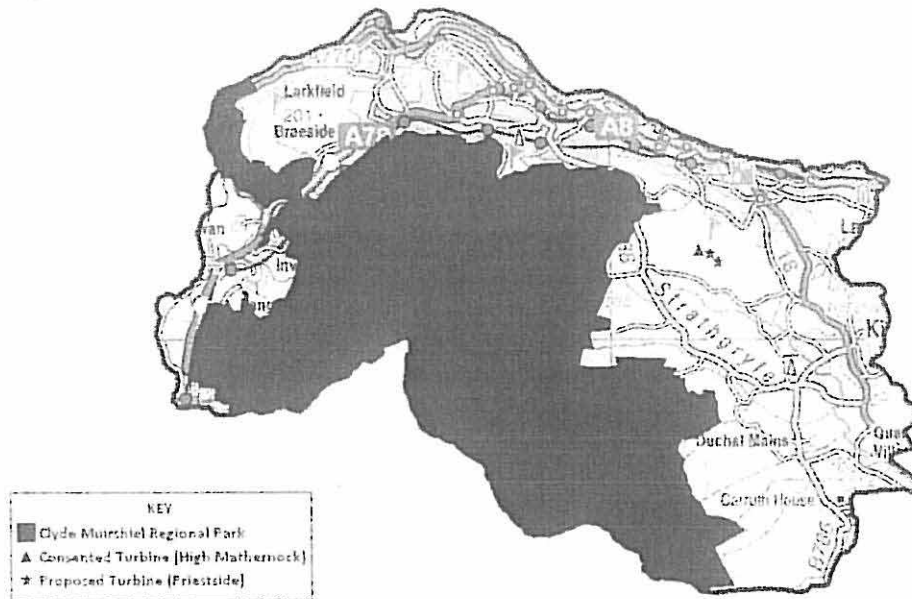
(c) **residential amenity**; the noise assessment submitted in support of the application indicates that no turbine of the scale proposed should be located within 675 metres of any dwelling.¹⁷⁾ Figure 5 outlines these parts of Inverclyde outwith this buffer.

Figure 5



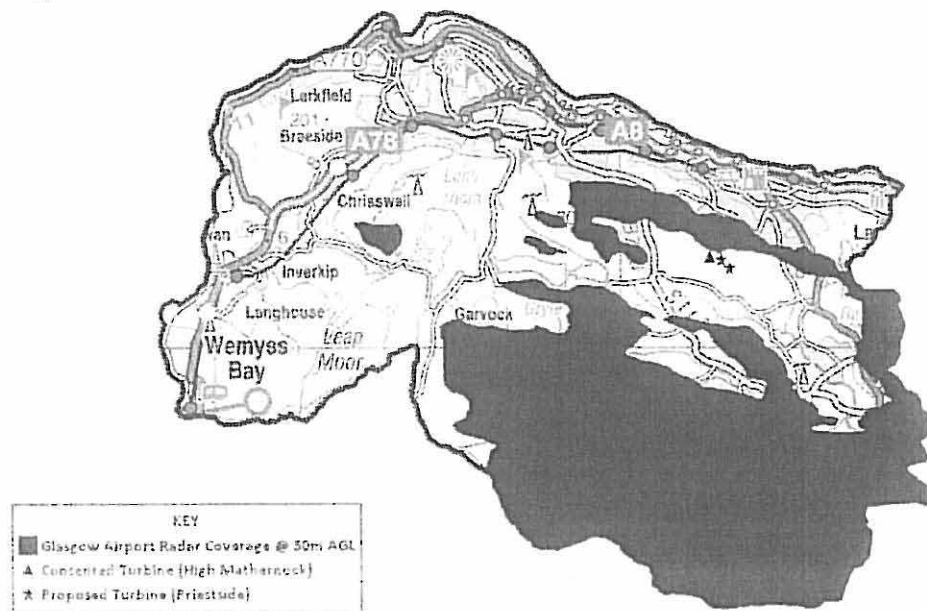
(d) tourism and leisure resources; Clyde Muirshiel Regional Park¹⁸⁾ is outlined on Figure 6.

Figure 6



(e) the operations of aircraft and telecommunications equipment; the restricted areas relating to Glasgow Airport radar¹⁹⁾ are outlined on Figure 7.

Figure 7



When these three constraints, outlined in Policy UT6 are overlaid on a single map, Figure 8 is produced.

Figure 8

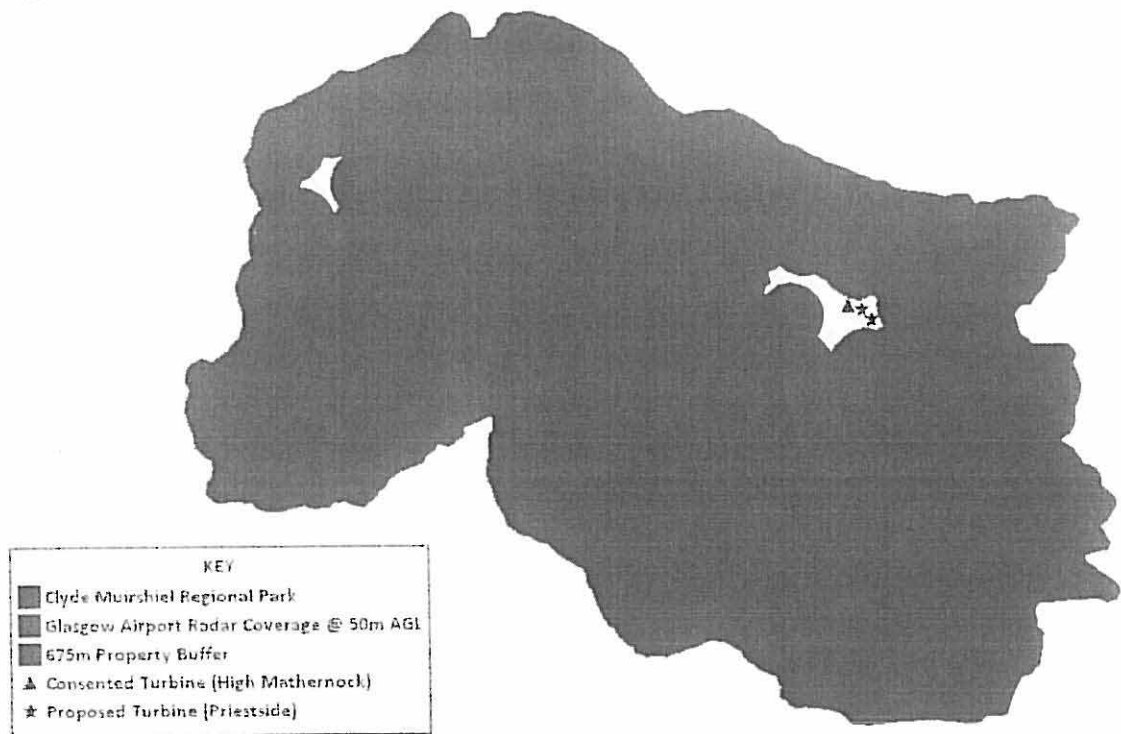


Figure 8 demonstrates, the site at Priestside is one of extremely limited locations where basic factors restricting development of wind turbines (over 50m) do not apply. For this reason; and the fact that the development has been optimised to realise the area's renewable energy potential, it is submitted that the proposal accords with Inverclyde's renewable energy advice¹¹⁰¹ that states:

'Planning authorities, through Development Plans, should support the development of a diverse range and size of renewable energy technologies by guiding them to appropriate locations and making sure an area's renewable energy potential is realised and optimised to ensure maximum benefit.'

CONCLUSIONS

No statutory consultee objected and only limited local opposition to the proposals.

The thrust of Government Policy is planning authorities should support such projects.

The grounds for refusal are similar to that of the adjacent wind turbine at High Mathernock. When put to the DPEA, the Reporter concluded; 'visual impact would not be so significant as to justify refusal' and 'the proposal accorded with the broad spirit of the development plan.'

The vast majority of Inverclyde's residents will not be able to see the wind turbines from their dwellings.

The one approved and two proposed turbines are equally spaced and will be built with identical turbines, therefore appearing as a single three turbine development. Common sense dictates this is preferential to widespread and mismatching developments over a wider area; this also accords with SNH Guidance.

It is unreasonable to think turbines can be placed in locations with consistent exposure to prevailing winds and not have some degree of visual impact.

If Inverclyde Council are serious about contributing to the Scottish Government's target of 80% of Scotland's electricity from renewable resources by 2020, then wind turbines over 50m will require to be approved.

Priestside is one of very limited opportunities to develop turbines over 50m in Inverclyde. The countryside surrounding Priestside has a high degree of industrialised clutter with Devol Moor sub-station and associated pylon lines, surely if turbines are to be developed anywhere it makes common sense to start in a location where the landscape is already degraded, rather than disturb the unspoilt areas of Clyde Muirshiel Regional Park.

For all of the reasons outlined above it is requested that the Review Body overturn the Officers decision and grant planning permission.

REFERENCES

¹¹¹ *Inverclyde Local Plan 2005, Interim Supplementary Planning Guidance (SPG) for Wind Farms, March 2010. This Report was presented to the Council in March 2010, and led to the approval of the Supplementary Planning Guidance for Wind Farms and Interim Local Plan Policies UT6A and B. The quote is taken from, CONCLUSIONS ON OPPORTUNITIES FOR STRATEGIC WIND FARMS.*

¹¹² *Scottish Natural Heritage, Siting and Designing Wind Farms in the Landscape, Version 1, December 2009. The extract used is from paragraph 3.4.*

¹¹³ *Inverclyde Local Plan 2005, Interim Supplementary Planning Guidance (SPG) for Wind Farms, March 2010. This Report was presented to the Council in March 2010, and led to the approval of the Supplementary Planning Guidance for Wind Farms and Interim Local Plan Policies UT6A and B. The quote is taken from; 3. Refining remaining areas of no significant constraint, Wind speed/Grid connection.*

¹¹⁴ *Figure 3 assumes an annual average wind speed at 45m above ground level of 7.5m/s, computer software has then been used to extrapolate this to anticipated wind speed at different hub heights, accordingly it is assumed wind speeds for the individual sites are: Priestside 7.5m/s, Finnochbog & Leitchland 7m/s, Dowries 6.5m/s. Turbine output has been taken from manufacturers published data less a factor of 0.9 to cover anticipated losses.*

¹¹⁵ *Figure 4 is based on a combination of:*
i. *Published data from Scotland Census Results 2001.*
ii. *Ofgem's Typical Domestic Electrical Energy Consumption Figures. This assumes a household domestic consumption of 3,300kWh/annum.*
iii. *Manufacturers published data less a factor of 0.9 to cover anticipated losses.*

¹¹⁶ *The renewable energy generation target was initially set out in Scottish Planning Policy, paragraph 187. This was then superseded in a speech given by Alex Salmond in September 2010.*

¹¹⁷ *To demonstrate the constraint of residential amenity all residential properties within Inverclyde were identified. For accuracy some rural properties and Skelmorlie in North Ayrshire that lie outwith Inverclyde but within 675m of the boundary have been included. Also included are the caravan parks at the Cloch and Kellybank. Once all residences were identified a 675m property buffer was applied.*

There are instances where turbines in >50m can be developed less than 675m from residential property. If a property has financial involvement in the wind turbine(s) noise levels at their own property is of their own discretion. In a noisy environment (e.g. close to a motorway, dual-carriageway, railway, industrial estates, open-cast quarries, etc) the noise of the wind turbine(s) can merge with the background noise, resulting in less onerous noise separation buffers (this usually requires on-site measurement). Manufacturers can down-rate wind turbine(s) to reduce noise emissions, this reduces wind turbine production capacity, accordingly developers try to avoid this. Figure 5 is designed to be indicative and not definitive, as explained there are instances where wind turbine(s) >50m could be developed within 675m of properties. It does however demonstrate areas where residential amenity is less likely to be compromised by wind turbine development.

¹¹⁸ *This map shows Clyde Muirshiel Regional Park combined with the West Renfrew Hill Regional Scenic Area. This is indicative of Inverclyde's SPG as referenced in ¹¹¹*

¹¹⁹ *This map shows the areas that Glasgow Airport Radar Coverage is at 50m above ground level or less. The development of wind turbines >50m in these areas is likely to draw an aviation objection. It should be noted as of July 2013 the following three proven forms of radar mitigation exist for Glasgow Airport Radar:*

- i. *Blanking of single wind turbines from the radar screens.*
- ii. *Radar in-fill using Kincardine Radar operated by Scottish Power.*
- iii. *Radar in-fill using Cumbernauld Radar operated by Scottish & Southern Energy.*

The blanking of single wind turbine may be applicable in certain circumstances. This may mean some areas are suitable for a single wind turbine >50m in areas current shown as black on the map, however it would not be applicable to groups of turbines >50m. The radar ceilings from Kincardine Radar are generally too high over Inverclyde to be useful for radar in-fill. The radar ceilings from Cumbernauld Radar are generally too low over Inverclyde to be useful for radar in-fill.

Radar mitigation is a fluid situation and circumstances may change in the future, however as of July 2013 no other proven form of mitigation exists for Glasgow Airport Radar.

¹²⁰ *This quote is taken from Inverclyde Council's website: <http://www.inverclyde.gov.uk/planning-and-the-environment/planning/renewable-energy?pg=1>*

PRODUCTION 1

Report of Handling

REPORT OF HANDLING

Report By: Guy Phillips

Report No: 13/0036/AC

Contact 01475 712422
Officer:

Date: 18th April 2013

Subject: Erection of 2 No. 67 metre high (to blade tip) wind turbines at
Priestside Farm, Auchentiber Road, Kilmacolm

SITE DESCRIPTION

The site is in the countryside, between Port Glasgow and Kilmacolm, approximately 700m to the north of Priestside Farm standing on Auchentiber Road. It is within the Green Belt and the Devol Road Upland Site Of Important Nature Conservation (SINC). There are two lines of electricity pylons running to the north and south of the site. Approximately 400m to the west, at High Mathernock Farm is the site of a 67m high to blade tip wind turbine, granted planning permission in August last year. There is a temporary anemometer mast on the wind turbine site at High Mathernock.

Residential properties in proximity to the site include Auchentiber Farm to the west, High Mathernock Farm, Priestside Farm, "Cauldside" and "Pennysteral", Gryffeside Farm and Overwood all to the south and "West Kilbride" and "Cunston Cottage" to the east.

PROPOSAL

It is proposed to erect two wind turbines, each with a height of 67m to blade tip. Access would be by a Y shaped track to be formed off Devol Track, approximately 500m to the west. The access track is also within the Devol Road Upland SINC site.

The planning application is accompanied by maps detailing location and context, topography, theoretical visibility and cumulative impact, photomontages and wire frame diagrams and a Landscape Statement, all to illustrate visual impact within a 15km radius of the site. Also submitted are an Associated Infrastructure Assessment, Newt Habitat Survey, Bat Survey, Otter & Water Vole Survey, Bird & Badger Impact Assessment and a Noise Impact assessment.

The maps accompanying the planning application illustrate that views of the proposed turbines are possible from as far afield as Johnstone, Bonhill, Dumbarton, Cardross, Helensburgh, Roseneath and Kilcreggan. Within Inverclyde, long views are possible from Kilmacolm, Quarriers Village and the eastern periphery of Port Glasgow.

Through their supporting information the applicant reaches the following conclusions:

1. The combination of the approved wind turbine at High Mathernock and those proposed would elevate the level of cumulative impact within the area. Their uniformity and proximity would maintain the impression of a single, uniform, development, preferable to widespread and mismatching developments in the future.

2. If suitable agreements can be put in place with the Roads Authorities for necessary upgrades, the route to the site can be navigated by vehicles carrying the components of the wind turbines.
3. There is no significant impact upon the three Scheduled Ancient Monuments within 2km of the site; Pennysteral Farm Motte, High Mathernock Anti-Aircraft Battery and Craigmarioch Wood Fort.
4. The development would not be visible to Glasgow Airport's Primary Radar System or any military radar installation.
5. The turbines are a safe distance away from a replacement line of electricity pylons proposed to the north of the site.
6. Pollution threats, including upon private water supply, are minimal.
7. As the turbines are in excess of 10 rotor diameters from the nearest house, they comply with Scottish Planning Policy on shadow flicker.
8. There is not anticipated to be any impact on communication systems.
9. There is no significant likelihood of any impact on Great Crested Newts.
10. Impact upon individual bats and bat populations is expected to be very low.
11. It is considered unlikely that otters shall suffer any significant negative impacts from construction works, the operation of the wind turbines and their decommissioning.
12. The proposed turbines, access track, turning areas and crane pads will have an impact of very low significance on the SINC habitats and to bird life using the area and no effect on badgers.
13. There is unlikely to be disturbance from noise.

The applicant has confirmed that the output from the proposed turbines is not for local need and is to be fed into the national grid. The Planning Statement submitted with the planning application confirms that an application has been made to Scottish Power to connect to either of the existing 11kV or 33kV overhead line networks.

LOCAL PLAN POLICIES

Local Plan Policy UT6 - Renewable Energy Infrastructure

In assessing proposals for renewable energy infrastructure, Inverclyde Council, as Planning Authority, will have regard to the impact on:

- (a) the natural environment and built heritage of the locality;
- (b) the landscape, particularly when viewed from major transport corridors;
- (c) residential amenity;
- (d) tourism and leisure resources, particularly if within the Clyde Muirshiel Regional Park; and
- (e) the operation of aircraft and telecommunications equipment.

Local Plan Policy UT6A - Wind Farms of 20MW and Above

Wind farms with an output of 20 MW and over will be supported where:

Wind farms with an output of 20MW and over will be supported where:

- a) the objectives of international natural heritage designation are not compromised or where the proposed development is likely to have an adverse effect:
 - there is no alternative solution; and
 - there are imperative reasons of over-riding public interest, including those of a social or economic nature;
- b) the objectives of national natural heritage designation and the overall integrity of the area are not compromised or where any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social and economic benefits of national importance;

and where the proposed development:

- c) is sited within the landform to ensure it does not have a detrimental effect on the landscape and wider environment;
- d) does not have an unacceptable adverse impact on the positive strategic assets of Clyde Muirshiel Regional Park and the West Renfrew Hills Scenic Area, such as:
 - i. landscape and visual amenity;
 - ii. tourism;
 - iii. recreation; and
 - iv. conservation;
- e) does not have an unacceptable adverse impact directly on the built heritage of the area or its setting;
- f) does not have an unacceptable adverse impact on biodiversity;
- g) does not have an unacceptable impact on the water environment, including its quality, quantity and ecological status;
- h) does not lead to unacceptable cumulative impacts on the landscape;
- i) does not have an unacceptable adverse effect on aviation interests;

and where:

- j) in consultation with the relevant bodies, the presence of notifiable installations and exclusion zones are taken into account when designing sites; and
- k) in consultation with the relevant bodies, the presence of broadcasting and telecommunications infrastructure are taken into account when designing sites.

Note (1) These criteria would also apply to smaller scale wind farms (<20MW) which can often be more easily accommodated in the landscape, therefore, some of the areas that are not suitable for strategic wind farms could be acceptable. It would still be necessary to protect the environmental and built heritage resources and the local community by ensuring they were designed and sited to incur minimum impact. Given the variety of combinations and sizes of turbines that could be used to produce an output up to 20MW, it is likely that it will only be possible to determine what is acceptable when specific applications are assessed.

Local Plan Policy UT6B - Small Scale Wind Turbine development

In assessing proposals for small scale wind turbine developments, Inverclyde Council, as Planning Authority, will be supportive where the proposed development satisfies the criteria of Local Plan

Policies UT6 and UT6A, where relevant, and will have regard to the impact on:

- a) neighbouring/adjoining properties and residential amenity generally;
- b) road safety;
- c) natural and built heritage resources in proximity to the site;
- d) wildlife resources and habitats;
- e) proximity to pylons and overhead power lines, and other service infrastructure; and
- f) the landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements, and when set against the skyline.

Local Plan Policy DS8 - Green Belt

There is a presumption against development in the designated Green Belt, as identified on the Proposals Map. Proposals will only be considered favourably in exceptional or mitigating circumstances and where the criteria for development in Policy DS10 for the 'Countryside' can be satisfied.

Local Plan Policy DS10 - Countryside

Development within the countryside (including the Green Belt) will be permitted only where it can be supported with reference to the following criteria:

- (a) it is required for the purposes of agriculture and forestry;
- (b) it is a recreation, leisure or tourism proposal which is appropriate for the countryside and contributes to the social and economic development of the area;
- (c) there is a specific locational requirement for the use and it cannot be accommodated on an alternative site;
- (d) it entails appropriate re-use of vacant buildings which it would be desirable to retain for their historic or architectural character; or
- (e) it forms part of an establishment or institution standing in extensive grounds; and
- (f) it does not adversely impact on the landscape character;
- (g) it does not adversely impact on the natural heritage resource;
- (h) it does not adversely affect the visual amenity of the area and is capable of satisfactory mitigation;
- (i) there is a need for additional land for development purposes, provided it takes account of the requirements of the Structure Plan; and
- (j) it complies with other relevant Local Plan policies.

Local Plan Policy HR1 - Designated Environmental Resources and Built Heritage

Development that would adversely affect, directly or indirectly, the natural or built heritage resources listed in Schedule 9.1 and where indicated, on the Proposals Map, will not normally be permitted.

Having regard to the designation of the environmental resource and built heritage, exceptions will only be made where:

- (a) Sites of Special Scientific Interest (SSSI) will not be compromised;
- (b) visual amenity and townscape will not be compromised;
- (c) no other site, identified in the Local Plan as suitable, is available;
- (d) the social and economic benefits of the scheme outweigh the total or partial loss of the environmental resource;
- (e) the developer has demonstrated that the impact of the development on the environment will be minimised; and
- (f) the loss can be compensated by habitat creation/site enhancement elsewhere, and where there are satisfactory arrangements to achieve this.

CONSULTATIONS

CAA – No objections

NATS - CTC - No objections

MOD Safeguarding - No objections

BAA Aerodrome Safeguarding - No objections

Head Of Environmental And Commercial Services - No objections subject to conditions requiring the submission of a drainage impact assessment, reserving the size and weight of construction and maintenance vehicles, their route and number of trips and the submission of a remediation scheme for roads and verges.

Head Of Safer And Inclusive Communities - No objections subject to conditions to control the spread of Japanese Knotweed and any potential site contamination and to restrict noise.

West Dunbartonshire Council – no response.

Argyll And Bute Council – no response.

PUBLICITY

The application was advertised in the Greenock Telegraph on 15th February 2013 as there are no premises on neighbouring land.

SITE NOTICES

The nature of the proposal did not require a site notice.

PUBLIC PARTICIPATION

Six written representations have been received, including from Kilmacolm Civic Trust.

The objectors are concerned that:-

1. The turbines dominate the skyline with a visual impact extending to many dwellings falling within a 2km radius at Port Glasgow, Auchenbothie and Kilmacolm in addition to those in immediate proximity to them. The joint campus school under construction in Port Glasgow is also impacted.
2. To grant planning permission in this instance shall result in a proliferation of wind turbines spoiling the landscape in a disorganised and unplanned manner
3. In the appeal decision for the wind turbine approved at High Mathernock, the Reporter advised that any future proposals would have to be assessed on their own merit including the cumulative impact with existing turbines which would place a limit on the number allowed. He further advised that his conclusion may have been different if a greater number of turbines were proposed.
4. The development shall create a three turbine wind farm.
5. Consultation is on going for a development of 10, 110m high wind turbines on a site to the north of the application site. Approval of that development and that under consideration in this planning application would result in two wind farms, approximately 2km apart.

6. The turbines are commercial in scale, not for domestic use, visually obtrusive over long distances, have a differential speed range, cause shadow flicker and are inefficient.
7. Nearby houses shall be adversely impacted by noise and shadow flicker.
8. The Glasgow & Clyde Valley Landscape Assessment seeks to discourage the erection of additional masts and tall structures in the hills.
9. Wind turbines should not be sited in the Green Belt.
10. The area shall become less attractive to visitors.
11. Auchentiber Road carries a high degree of commuter traffic and serves as a short cut from Port Glasgow to Kilmacolm.
12. Private water supplies and wildlife shall be adversely affected by the construction works. Wildlife shall be further impacted by the rotor blades.
13. The applicant's assessment of the impact on migratory birds fails to mention the annual congregation of large numbers of Barnacle Geese to the west of Cunston Cottage.
14. Construction of the turbines shall result in the release of CO₂.
15. There is a danger from potential ice throw.
16. Future methods of harnessing wind energy may render wind turbines obsolete within a short timescale.
17. Fixed turbine technology is not commercially viable without government subsidy.
18. There shall be an adverse impact upon the values of nearby houses.
19. There is no economic benefit to the local area.

ASSESSMENT

The site is located within the Green Belt, where Local Plan policies DS8 and DS10 apply. However, as a renewable energy development which may be expected to be located in a Green Belt/rural location, it is considered appropriate to assess the proposal against national and local planning policy for such developments.

The general planning policy position, stemming from Scottish Planning Policy, is that planning authorities should support the development of a diverse range of renewable energy technologies and that development plans or supplementary guidance must clearly indicate factors that will be taken into account in decision making. The Government itself provides web based renewables advice and this is reflected in the Council's Interim Planning Policy Position Statement on Small Scale Wind Farms, approved by the Safe Sustainable Communities Committee in March 2011. This statement introduced a new Policy UT6B which identifies that the Council will be supportive of development where the criteria of Policies UT6 (Renewable Energy Infrastructure) and UT6A (Wind Farms of 20MW and above) have been met and there has been regard to:

- a) the impact on neighbouring and nearby properties and residential amenity generally;
- b) road safety;
- c) natural and built heritage resources in proximity to the site.
- d) wildlife resources and habitats.
- e) proximity to pylons and overhead power lines and other service infrastructure.

- f) the landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements, and when set against the skyline.

Policies UT6 and UT6A require consideration of the potential impact on the operation of aircraft and telecommunications equipment. I note, however, that the CAA, National Air Traffic Service, BAA and the MOD offer no objections.

The policies also require assessment of the impact on the natural and built environment, landscape, and residential amenity, all of which are also addressed by assessment against Policy UT6B (criteria a, c, d and f). Countryside tourism is inextricably linked to the quality of landscape and views from public vantage points, and it is appropriate to consider this in an assessment against Policy UT6B (criterion f).

Accordingly it remains to assess the application against the criteria listed in Policy UT6B with reference to Scottish Planning Policy and other development plan policies as applicable.

- a) Impact on neighbouring and nearby properties and residential amenity generally.

Policy UT6B requires development to have regard to impact on neighbours and general residential amenity. There are 9 residential properties in the immediate area surrounding the site of the proposed wind turbines. Potential impacts upon them arise from shadow flicker, noise and visual impact. The Scottish Government's online advice "Onshore Wind Turbines" advises that where separation is provided between wind turbines and nearby dwellings of 10 rotor diameters shadow flicker should not be a problem. The necessary separation distance in this instance, therefore, is 440m, which the proposal satisfies (the nearest house is approximately 627 metres distant). The proposal therefore accords with Government advice on separation for shadow flicker.

With respect to the issue of noise, there are no objections from the Head of Safer and Inclusive Communities.

Adverse visual impact is of most significance to those living closest to it and is a key factor in the determination of the application. The photomontages submitted with the planning application are taken at distances ranging between 860m and 4.78km. The wind turbines would be highly visible from the closest dwellings set within an area of rolling countryside. At a distance of a little over 600m metres to the nearest house, I consider that the visual impact of large turbines will be of major significance to residents living closest to them and forms grounds for refusal of the application.

- b) Road safety. There are no objections from the Head of Environmental and Commercial Services on road safety grounds.

- c) and d) Natural and built heritage resources in proximity to the site and wildlife resources and habitats.

The site is within a SINC and as such it also requires assessment against Policy HR1. The policy advises that development that would adversely affect, directly or indirectly, listed natural or built heritage resources will not normally be permitted. The proposal requires further assessment against criteria (a) - (e) within policy HR1:

- (a) Sites of Special Scientific Interest will not be compromised. The proposal does not affect an SSSI and is, therefore, acceptable in this regard. I accept the applicant's conclusion that the proposal has an impact of very low significance on the SINC habitats.
- (b) Visual amenity and townscape. I shall assess this impact in detail under criterion (f) of policy UT6B.
- (c) No other site, identified in the Local Plan as suitable is available. While no other site has been identified as suitable for large scale wind turbine development in this part of

Inverclyde's countryside, I do not consider that that provides any justification for granting planning permission.

- (d) The social and economic benefits of the scheme outweigh the total or partial loss of the environmental resource. In determining the appeal for the wind turbine at High Mathernock, the Reporter considered that the site has little conservation value. The application site lies within the same SINC site and I am in agreement with the conclusion of the Habitat Study.
- (e) The impact of the development on the environment will be minimised. I shall assess this impact in detail under criterion (f) of policy UT6B.
- (f) Loss can be compensated by habitat creation/site enhancement elsewhere on the applicant's land. The site is small and habitat disruption may be compensated elsewhere.

Overall, I am satisfied that policy HR1 is not compromised.

e) Proximity to pylons and overhead power lines and other service infrastructure. Two existing power lines run to the north and south of the site. I consider that there is sufficient distance between the proposed turbine and overhead lines for safety not to be an issue.

f) The landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements, and when set against the skyline.

Criterion (b) of Policy HR1 and criterion (f) of Policy UT6B require consideration to be given to visual amenity with particular reference to the experience of the landscape when viewed from public vantage points, including local roads, neighbouring settlements and when set against the skyline. The main public vantage points in close proximity are Auchentiber Road, the B788 and Auchenbothie Road. The submitted photomontages demonstrate that the turbines are seen to break the skyline from all of these roads. At a distance of around 600 metres from Auchentiber Road, at its nearest point, I consider this breaking of the skyline to be of significance and to have an adverse impact upon visual amenity.

Scottish Government guidance for assessing visual impact indicates that scale is a relevant consideration, taking into account the significance of the landscape and the views, proximity, intervisibility and sensitivity of visual receptors. I agree with part of the conclusion of the Landscape Statement i.e. the combination of the approved wind turbine at High Mathernock and those proposed would elevate the level of cumulative impact within the area. The remainder of the conclusion of the Landscape Statement that uniformity and proximity would maintain the impression of a single, uniform, development, preferable to widespread and mismatching developments in the future does not, I consider provide justification for further large scale wind turbine development in this part of Inverclyde's countryside. As evidenced by the photomontages and wire frame diagrams submitted with the planning application, the turbines would appear as dominant elements in the landscape and be seen to break the skyline in numerous directions

I acknowledge the lines of pylons running to the north and south of the site as an existing element of the landscape. Unlike wind turbines, however, these are a static feature. The turbines are, to blade tip, higher and being animated features, are a greater visual intrusion. I consider this to be to the visual detriment and experience of the landscape.

I consider the view of the Reporter in the determination of the appeal for the turbine approved at the adjoining High Mathernock key to the assessment of impact upon views from further afield. He took the view that a single turbine when viewed from Kilmacolm, Port Glasgow and further afield in Argyll, would not be significant. Critically, however, he also advised that his conclusion may have been different if a greater number of turbines were proposed. The proposal would result in a trebling of the presence of large wind turbines in this part of Inverclyde's countryside. As evidenced by the photomontages and wire frame diagrams, there is a significant and adverse visual impact upon the views of the site from the boundaries of Port Glasgow and Kilmacolm.

In summary, while there are wind turbines elsewhere throughout Scotland which are significantly higher than that proposed I consider that within the context of the local landscape, the presence of

nearby houses and proximity to the B788 road, the 67m high turbines, when added to the 67m high turbine granted on appeal at the adjoining High Mathernock, have an adverse cumulative impact on visual amenity and landscape character.

In response to the objectors' concerns not covered by my assessment against the Local Plan:

The area shall become less attractive to visitors: Auchentiber Road is designated as a core footpath, encouraging walkers into the countryside. Policy LR6 informs that the Council will seek to protect and promote the 'core path network' (both existing and proposed) and the other key themes of the adopted Inverclyde Access Strategy. In determining the appeal for the wind turbine previously granted planning permission at High Mathernock, the Reporter determined that the scale of the development would be unlikely to discourage many people walking past on a through route. He further determined that some individuals may regard the turbine as being of visual interest. The proximity of the proposed wind turbines to that granted on appeal satisfy me that the Reporter's view regarding potential impact on users of the Core Footpath remains valid.

Private water supplies and wildlife shall be adversely affected by the construction works – impact upon private water supplies is, I consider, satisfactorily addressed by the Hydrology & Geology section of the Associated Infrastructure Assessment and there are no objections from the Head of Safer & Inclusive Communities.

Wildlife shall be further impacted by the rotor blades: I am in agreement with the conclusions of the Newt Habitat Survey, Bat Survey, Otter & Water Vole Survey, Bird & Badger Impact Assessment that there are no significant impacts upon wildlife.

There is a danger from potential ice throw: While there may be a small potential risk from ice throw in cold conditions, I consider that this does not justify refusal of planning permission.

There shall be an adverse impact upon the values of nearby houses: This is not a material Planning consideration

There is no economic benefit to the local area: The fact that output from the turbines is to be fed direct to the National Grid, for profit, determines that there is no specific requirement for them at the location, however, given Government policy to support renewable energy, that does not provide a justification for refusal of planning permission.

Given my unfavourable assessment of impacts upon visual amenity and landscape character I consider the proposal fails to accord criterion (f) of Policy UT6B, and consequently Policy UT6 (criterion b) and Policy UT6A (criterion c).

DECISION

That the application be refused for the following reason:

1. The height and scale of the proposed turbines and their proximity to the wind turbine granted planning permission at High Mathernock, nearby housing, Auchentiber Road, Auchenbothie Road, the B788, Kilmacolm village and the eastern part of upper Port Glasgow have a cumulative impact in creating an unexpected and dominant collective feature in this part of the Inverclyde countryside to the detriment of visual amenity and landscape character and thus contrary to:
 - a. Policy UT6 of the Inverclyde Local Plan, criterion (b) which requires regard to be given to the landscape, especially when viewed from major transport corridors.

- b. Interim Inverclyde Local Plan Policy UT6A, criterion (c) which requires turbines to be sited within the landform to ensure that they do not have a detrimental effect on the landscape and wider environment.
- c. Interim Inverclyde Local Plan Policy UT6B, criterion (f) which requires regard to be given to the landscape, especially when viewed from public vantage points, including local roads, neighbouring settlements and when set against the skyline.

Signed:



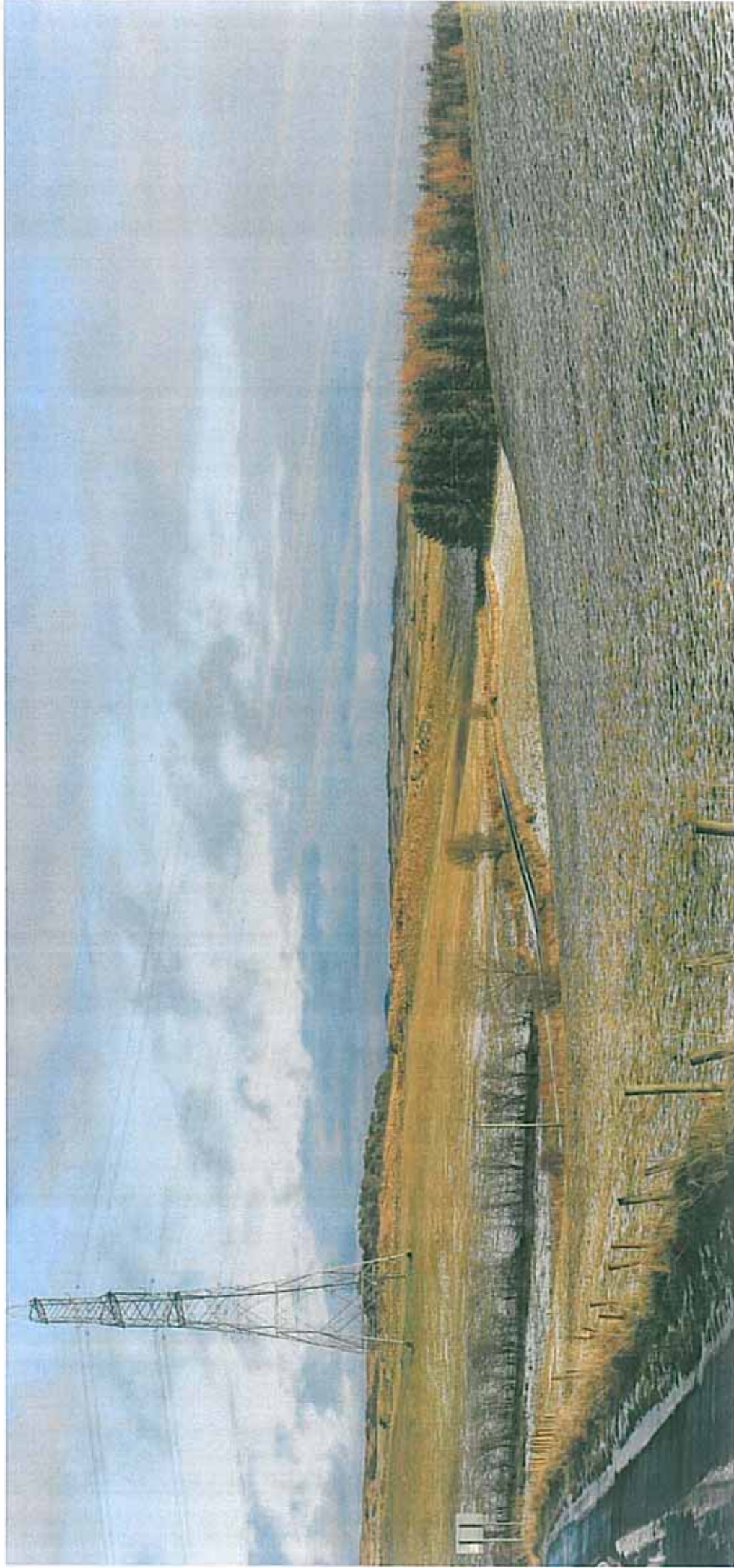
Case Officer: Guy Phillips



Stuart Jamieson
Head of Regeneration and Planning

PRODUCTION 2

Landscape Statement



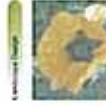
PRIESTSIDE FARM TWO WIND TURBINES

LANDSCAPE STATEMENT

On behalf of GORDON DUNLOP

December 2012

DAVID WILSON ASSOCIATES
landscape architects



Aros House 121 Cadzow Street Hamilton ML3 6JA
www.davidwilsonassociates.co.uk
Tel: 01698 200035 Fax: 01698 200036
email: design@dwlandscape.co.uk

Landscape Statement

in relation to

Two Wind Turbines

Proposed at

**Priestside Farm,
Inverclyde**

**DAVID WILSON ASSOCIATES
landscape architects**

Contents

- 1. Introduction
- 2. Methodology
- 3. Location and Context
- 4. Landscape setting
- 5. Proposals
- 6. Visual Impact
- 7. Photo Montages
- 8. Cumulative
- 9. Overall Conclusions

Illustrations

- L1 Location and Context
- L2 Topography
- L3 30km Zone of Theoretical Visibility
- L4 15km Zone of Theoretical Visibility
- L5 Cumulative effect

- P1 Photo Montage
- P2 Photo Montage
- P3 Photo Montage
- P4 Photo Montage
- P5 Photo Montage
- P6 Photo Montage
- P7 Photo Montage

1. Introduction

- 1.1 Mr Gordon Dunlop has commissioned David Wilson Associates to prepare a Landscape Statement in relation to the proposals to install two wind turbines at Priestside Farm, between Kilmacollm and Port Glasgow, in Inverclyde.
- 1.2 The Turbines proposed are to be an Enercon E-44 or potentially a EWT DW52 which are both 67m to the tip of the blade and can generate up to 0.9 Mega Watts. Further details of these turbine models are contained in the Associated Infrastructure Assessment document. Permission for a single E-44 or EWT DW52, also at 67m to blade tip, has been granted for a site approximately 410m to the west.
- 1.3 The potential impacts of this development will be assessed in relation to the various guidelines which have been published on the matter but will refer mostly to "Assessing the impact of small-scale wind energy proposals on the natural heritage (February 2012)" produced by Scottish Natural Heritage.
- 1.4 Other documents which will be referred to are:
- Scottish Planning Policy (February 2010)
 - PAN 45: Renewable Energy Technologies (Scottish Executive)
 - PAN 45: Annex Planning for Micro Renewables
 - Guidelines on the Environmental Impacts of Windfarms and Small Scale Hydroelectric Schemes (SNH)
 - Micro renewables and the natural heritage Guidance Note (October 2009)
 - Guidelines on the Environmental Impacts of Windfarms and Small Scale Hydroelectric Schemes (SNH)
 - Photography and Photomontage in Landscape and Visual Impact Assessment: Landscape Institute Advice Note 01/11
 - Visual Representation of Windfarms Good Practice Guidance (March 2006)
 - Siting and Designing windfarms in the landscape, December 2009, Published by SNH
 - Cumulative Effect Of Windfarms (Version 2 revised 13.04.05)
 - The Glasgow and Clyde Valley Landscape Assessment (No 116), prepared by Land Use Consultants, Published by SNH
 - Framework Guidance Document on windfarm development proposals affecting Clyde Muirshiel Regional Park (Feb 2008)

- 1.5 The proposed site is also within Inverclyde Council so the following planning documents have been reviewed.
- Glasgow and Clyde Valley Approved Joint Structure Plan 2000 (4th All 2009)
 - Inverclyde Local Plan 2005
 - Interim Supplementary Planning Guidance (SPG) for Wind Farms and Maps (March 2010)

- 1.6 This Landscape Statement will also review and assess the impacts upon the landscape character, conservation designations, known archaeology and in most detail the visual impacts of the proposals on the wider landscape.



● Proposed Wind Turbines at NS 32615 72120(T1) & NS 32695 71815(T2)

● Consented Wind Turbine at NS 32097 72182

2. Methodology

2.1 The methodology of this study has been developed by David Wilson Associates through experience and in accordance with "Assessing the impact of small-scale wind energy proposals on the natural heritage (February 2012)" produced by Scottish Natural Heritage. This suggests the following level of assessment should be undertaken for turbines over 50m in height.

"Turbines over 50m in height - For turbines of this scale, a more detailed LVIA is likely to be required. We recommend that the LVIA, as a minimum, should include:

- a ZTV map out to 20km (may need to be larger radius for very large turbines);
- visualisations and photomontages, focusing on key viewpoints. The number and location of viewpoints should be proportional to the scale of the development and the sensitivity of the location, and should be agreed with the planning authority. In most locations between 5 and 10 viewpoints should be sufficient;
- an assessment of the sensitivity of the landscape, magnitude of change and residual impacts;
- a base plan map of all other wind turbine proposals in the public domain to 20km.

The height thresholds are not absolute. For example, a 100m turbine in a low sensitivity location will require less assessment than a 55m turbine in a more sensitive landscape. Therefore, the above requirements are an indication of the level likely to be required, but this should be tailored to the height of the turbine and the sensitivity of the location. The assessment should focus on the likely key landscape and visual interactions of the proposal with other constructed, consented or applied-for wind farms, and other significant man-made structures within a 20km radius of the site. In certain circumstances, for example where sequential impacts with other developments may be a key issue, it may be appropriate to extend the study area but this is less likely to be required for small developments. Our guidance on cumulative effects provides further information. We have also published guidance on Siting and design for small turbines of between 15 and 50m which will aid in the assessment process."

2.2 In order to assess the likely impacts of the proposals a baseline for the existing landscape must first be established. This will be the standard against which any change can be measured against and therefore the degree of impact determined. In order to do this the location and context of the surrounding area has been reviewed. This covers the general area, topography, and any landscape conservation or cultural heritage designations.

2.3 The following section then looks at the Landscape Character of the area as formally established in the "The Glasgow and Clyde Valley Landscape Assessment (No 116)" by SNH which gives a formal designation of the nature of the site and surrounding area and identifies specific sensitivities and issues.

2.4 Once a familiarity with the surrounding area has been established a short description of the proposals is given in order to establish the nature of what is to be introduced to the landscape.

2.5 Once the context and proposals have been established a study of the impacts that will be created can be carried out. Section 6 is a detailed study of the Visual Impact of the proposed turbines on the wider landscape and potentially sensitive receptors within it. This is carried through firstly establishing the Zone of Theoretical Visibility (ZTV) that could be caused on the landscape if a "Bare Earth" situation was the case using only topographical information to establish where views will and will not be possible. This is achieved through the use of ground modelling computer software and ordnance survey topographical data and is described in more detail in this section. The guidelines recommend a radius of 20km however a 30km radius has been used in this instance for consistency with the previous assessment of the High Mathernock turbine.

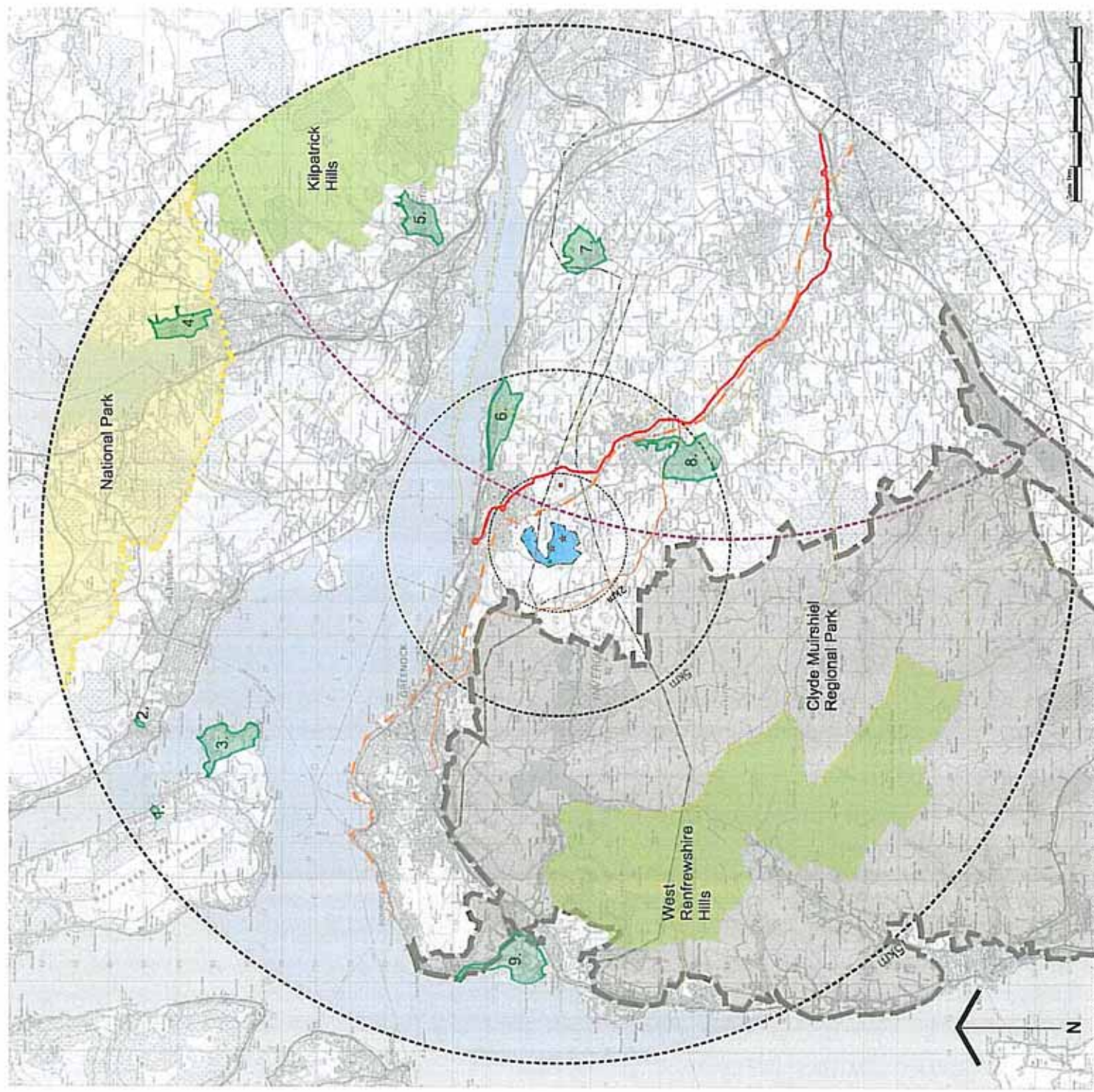
2.6 Following the creation of the ZTV drawing an on-site review of the sensitive receptors is undertaken to establish the baseline sensitivity of the receptor. The magnitude of change is then assessed through consideration of the physical features of the landscape and distance to the turbines and the resultant impact of the proposals suggested.

2.7 In addition to the study of these receptors an assessment has been made of the potential cumulative effect created by this proposal in relation to other existing or proposed wind energy developments within a 20km radius. This is in accordance with the recommendations set out in "Assessing the impact of small-scale wind energy proposals on the natural heritage (February 2012)". Drawing L5 shows all known developments out to 20km, as of December 2012.

2.8 The study will put forward some conclusions from the above assessments and will conclude with seven photo montages showing how the turbine will appear from key points in the landscape which have been established through onsite analysis of the key receptors and locations. These photo montages have been carried out in accordance with "Visual Representation of Windfarms Good Practice Guidance (29 March 2006)" and "Photography and Photomontage in Landscape and Visual Impact Assessment: Landscape Institute Advice Note 01/11" where it is appropriate to the scale of the proposals.

- Devol Road Upland S.I.N.C.
- Aerodrome Safeguarding Zone
- AGLVs
- Clyde Muirshiel Regional Park
- National Park Boundary
- NCN Route 75
- Garden and Designed Landscape
- Scheduled Monument
- High Mathernock Turbine
- Proposed Turbines
- A761
- B788
- Power Lines

PRIESTSIDE FARM
 L1 LOCATION & CONTEXT
 December 2012
DAVID WILSON ASSOCIATES
LANDSCAPE ARCHITECTS



3. Location and Context

Area

3.1 The proposed wind turbines will be located at grid coordinates NS 32615 72120 (T1) & NS 32895 71815 (T2) which is on the land to the north of Priestside Farm which lies across Auchentiber Road. The site is accessed by a farm track extending north from Auchentiber Road beyond the site towards Port Glasgow. The site is currently managed as rough grazing for cattle and sits between urban settlements on the lower ground to the north and farmland in the Gryfe valley to the south. The A761 road lies approximately 1.8km to the east and links Port Glasgow with Kilmacolm before continuing on through Bridge of Weir towards Paisley. 1.8km to the west is the B788 local road which links Greenock with the A761 to the immediate south of Kilmacolm. Auchentiber Road runs between these two roads 620m to the south and will provide access to the site.

3.2 The town of Port Glasgow lies to the north of the site and follows a ribbon style development along the coast of the Clyde estuary. This town merges with Greenock to the west and then Gourock beyond. Across the Clyde estuary lie the large towns of Dumbarton and Helensburgh, to the east and west respectively, and the small settlement of Cardross is to the North. The village of Kilmacolm lies in the Gryfe valley between 2.5km and 4.5km away to the south east with Bridge of Weir 5km further along the Gryfe valley in the same direction. The landscape to the west and south is largely open countryside with no significant settlements and a scattering of small farm holdings.

3.3 There are two main power lines which run east to west through the locality to the north and south of the proposed site, linked by a spur to the west at Devol Moor Power Sub-station. There are also several large water bodies which act as reservoirs to the surrounding settlements.

Topography

3.4 The topography of the area is dominated by the wide valley carved out by the Clyde estuary. Here the river widens significantly with the landform rising dramatically on both sides. Areas of flat land sit next to the river edge which have been largely settled over the years and in time this development has extended to the slopes of higher ground as with Port Glasgow and Greenock. This variation on flat ground and steep hills means that the settlements are contained within the Firth of Clyde estuary basin with occasional extended views where the alignment of the hills allows.

3.5 The higher land on which the site sits, on the south side of the Clyde Estuary, forms a plateau separated from the Clyde Estuary by a ridge line to the south of Greenock and Port Glasgow which approximately marks the development boundary of the settlements. To the south of this ridgeline the land becomes undulating farmland with moorland on the higher ground. Settlement in this area is also dictated by the topography with the significant small towns and villages lying within the Gryfe Valley to the south.

Conservation

3.6 There are no nationally recognised conservation designations in the immediate vicinity of the site. The closest SSSI is at Knockinairs Hill (NS 305 742) but this is at a distance of 2.55km from the closest turbine and its citation is based on its grassland flora which is unlikely to be impacted over this distance.

3.7 The area in which the site sits is designated as a Site of Importance for Nature Conservation (S.I.N.C.). This is a local designation put in place by Inverclyde Council. The description provided in the Councils Supplementary Document SD No.2 is as follows;

Devol Road Upland, Grid Reference: NS 323 722, Area 117ha.

"A mosaic of wet heathland and acid grassland with local areas of dry heath, bracken and gorse scrub. Grazing (cattle) and drainage have contributed to the variation shown in the heathland communities at the site.

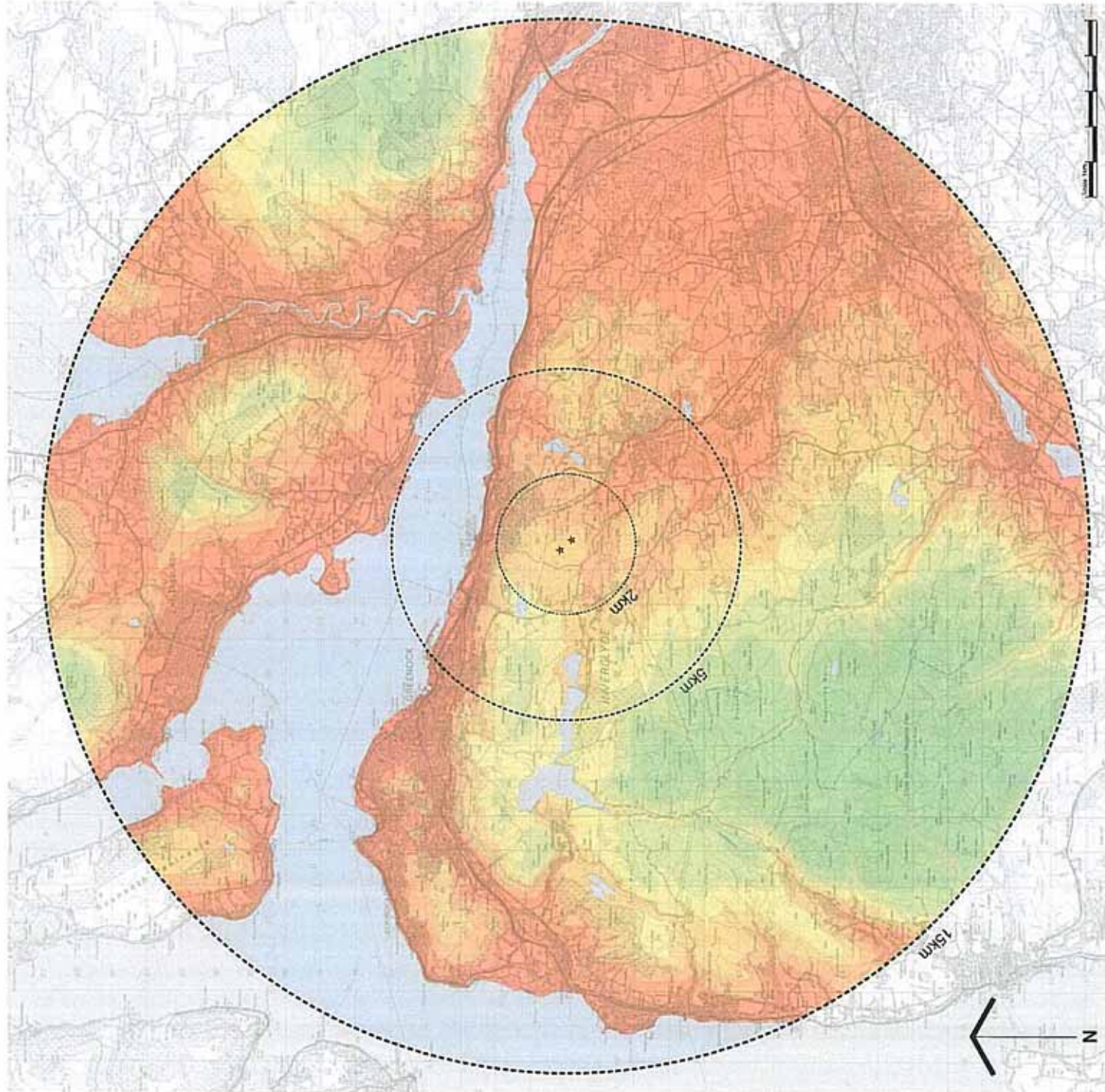
Much of the area is covered by Purple Moor-grass, Heather, Cross-leaved Heath, Wavy Hair-grass, Polytrichum moss and Sphagnum moss. Local species include Milkwort, Green-ribbed Sedge, Jointed Rush, Soft Rush, Yorkshire Fog, Deer-grass, Mat Grass, Common Sedge, Bog Asphodel, Common Cotton-grass and Devil's-bit Scabious.

Rocky outcrops and drier areas support Bell Heather. Marshy areas support plants such as Marsh Cinquefoil, Marsh Pennywort, Ragged Robin and Tufted Hair-grass. Local flushes are boggy in character and host a greater abundance of sphagnum mosses."



★ Proposed Turbines

PRIESTSIDE FARM
 L2 TOPOGRAPHY
 December 2012
DAVID WILSON ASSOCIATES
LANDSCAPE ARCHITECTS



3.8 Again this designation appears to be based on the value of its heathland flora and as such is unlikely to be unduly impacted physically by the running of the turbines. Some increased impact may come in the construction process in gaining access but this should be short lived. An Associated Infrastructure Assessment document has been prepared for the installation of the turbine. This anticipates that a total area of 6,065m² will be affected through road construction, foundations and installation access. This represents 0.518% of the 117ha S.I.N.C. area. Any damage would be very localised and should recover quickly.

3.9 In addition to this, initial discussions with Inverclyde Council have indicated that a review of the extensive number of S.I.N.C.s in the area is to be undertaken and may call into question the value of this designation.

3.10 In the wider study area there are several locations with conservation designations given to them. The majority of these are allocated for reasons relating to ecology or geology and will not be sensitive to visual impact however there are some designations which will be assessed on this basis. These are listed below:

- Clyde Murshiel Regional Park
- Loch Lomond and Trossachs National Park
- West Renfrewshire Hills Area of Great Landscape Value (AGLV)
- Kilpatrick Hills Area of Great Landscape Value (AGLV)
- Loch Lomond National Scenic Area

Cultural Heritage and Recreation

3.11 According to the Historic Scotland online database Pastimap, there is only one scheduled monument recorded within 2km of the site. This is **Craigmarlock Hill Fort** (ref:4379) approximately 1.5km to the east of the site. There are no listed buildings or Gardens and Designed Landscapes within this range. There are also no entries on the National Monuments Record for Scotland or the Scottish Sites and Monuments Record within 500m of the proposed location. Of those which exist across the wider landscape few have a particular visual sensitivity. Those which have been assessed are listed below:

1. **Gareloch House** (Gardens and Designed Landscape)
2. **Glenarn** (Gardens and Designed Landscape)
3. **Rosneath** (Gardens and Designed Landscape)
4. **Balloch Castle** (Gardens and Designed Landscape)
5. **Overtoun House** (Gardens and Designed Landscape)

6. **Findlaystone House** (Gardens and Designed Landscape)
7. **Formakin** (Gardens and Designed Landscape)
8. **Duchal House** (Gardens and Designed Landscape)
9. **Ardgowan** (Gardens and Designed Landscape)

3.12 There are also several paths and cycle routes through the study area within a range of 2km which have been assessed.

- **Devol Road - Core Path 37B**
- **Corlick Hill - Core Path 32A,B&C**
- **Auchentiber Rd – Core Path 29D**
- **Core Path 43**
- **Core Path 44**
- **National Cycle Network NCN75 (Core Path 57D)**

Conclusion

3.13 The designation of the site as a S.I.N.C. should not be affected in the long term as the reason for its status is based on the extensive groundcover vegetation across a wide area. This did not prevent the consent of the High Mathermock turbine to the west. As the turbines will have a relatively small footprint and the operational part (i.e. the blades) will be suspended above this ground cover. There will be a requirement for additional access to be taken through some of the vegetation but this will form a narrow track 4m wide and will be relatively small in relation to the overall area. Overall, the protected vegetation should not be unduly impacted across the wider SINC area. This matter will have to be explored further by Inverclyde Council as the designation has been made by them.

3.14 There are no other physical constraints to the installation of the turbines at the proposed site. Any other potential impacts would be visual and these will be assessed in the relevant section of this document.

4. Landscape setting

- 4.1 The aim of this chapter is to consider how the proposed wind turbines may affect the landscape setting. To do this three documents have been considered:
1. The Glasgow and Clyde Valley Landscape Assessment (No 116), prepared by Land Use Consultants in association with Glasgow University Archaeological Research Division and published by Scottish Natural Heritage in 1999.
 2. Interim Supplementary Planning Guidance (SPG) for Wind Farms (March 2010)
 3. Inverclyde Local Plan 2005

Glasgow and Clyde Valley Landscape Assessment

- 4.2 This was published over ten years ago when there was not the same demand for wind turbines. It does, however, consider the landscape of Glasgow and the Clyde Valley, its many varying types and the key characteristics that need to be protected. This provides a framework against which the landscape impact of the proposed turbines can be considered.
- 4.3 The Landscape in which the site sits is identified as the "Rugged Moorland Hills" character type or more specifically Renfrewshire Heights. This area covers a large swath of land to the west of the site with a small arm extending east along the ridge of hills to the south of Greenock and Port Glasgow that encapsulates the proposed location of the turbines.
- 4.4 The key characteristics of this landscape type are described as;
- o *"Distinctive upland character created by the combination of elevation, exposure, rugged landform, moorland vegetation and the predominant lack of modern development.*
 - o *..... a sense of apparent naturalness and remoteness which contrasts strongly with the farmed and developed lowland areas.*
 - o *Presence of archaeological sites on hilltops and sides."*

- 4.5 The first of these characteristics can be recognised in the site. The second is partially true but the close proximity of the farmed landscape to the south and east and the urban sprawl to the north means that this site is notably less remote and unspoiled than other areas in the main body of this character type. Whilst other sites may have archaeological features there are no recorded findings in the vicinity

- 4.6 The assessment goes on to state in the Planning and Management guidelines section;

".....these areas already accommodate tall structures such as pylons and communications masts; although these hills sometimes provide ideal locations for masts, the erection of such structures can lead to disproportionate levels of landscape impact, affecting the remote character of the moorland hills, and sometimes being visible on the skyline when viewed from surrounding lowland areas; consequently, the aim of landscape planning and management should, in order of priority, be to:

- o *Discourage the erection of additional masts or other tall structures within the hills*
- o *Encourage operators to share infrastructure with the aim of minimising the number of masts that are needed;*
- o *Steer any new masts to sites where the landscape and visual impact is minimised*
- o *Minimise the requirement for ancillary development such as service roads or service buildings."*

- 4.7 On the face of these recommendations the landscape character would seem to be unsuitable for the installation of wind turbines however, there does appear to be some scope for the erection of some structures should the visual impact be shown to be within acceptable parameters. The proposed turbines are a relatively small model with a moderate height and may therefore be a more acceptable kind of development. This will be examined in more detail in the visual impact section. An identical model has been approved for the site adjacent at High Mathernock.

Supplementary Guidance for Wind Farms

- 4.8 The Supplementary Guidance for Wind Farms states a largely favourable view of renewable energy from Inverclyde Council however it recognises the potential negative impacts which can result from wind farm development in the landscape.
- 4.9 Inverclyde Council deems that, only wind farm developments over 20MW to be Strategic and therefore guided by the Structure Plan. The turbines which are proposed would therefore be considered through the detailed policies of the local plan. Wind turbines of this scale or output are therefore not addressed through this document.

Inverclyde Local Plan 2005

- 4.10 The following policy in the Inverclyde Local Plan relates to Renewable Energy Infrastructure.

"Policy UT6 Renewable Energy Infrastructure

In assessing proposals for renewable energy infrastructure, Inverclyde Council, as Planning Authority, will have regard to the impact on:"

(a) "the natural environment and built heritage of the locality;"

There will be no impact to the built heritage of the area and impact upon the natural environment should be minimal. This is covered in more detail in the accompanying ecology statements.

(b) "the landscape, particularly when viewed from major transport corridors;"

This will be addressed in the section on visual impact and in particular through photo montages.

(c) "residential amenity;"

There are no residences in the immediate vicinity. The closest residence is at Cunstun Cottage 675m away. Amenity of more distant residential areas will be addressed in the visual impact section.

(d) "tourism and leisure resources, particularly if within the Clyde Muirshiel Regional Park;"

The area the turbines are to sit in is not renowned as a tourism or leisure resource. The impact on the wider area will be addressed in the visual impact section.

and

(e) "the operation of aircraft and telecommunications equipment."

Both these constraints have been assessed in the Associated Infrastructure Assessment and are not anticipated to be a problem.

Conclusion

4.10 The proposed turbines are in a relatively remote location and are unlikely to create physical impacts to other elements within the landscape or the area's inhabitants. The consent of the High Mathernock turbine would also endorse this view as many of the issues which would potentially have affected this turbine would have remain the case for the proposed ones. The issues which have been raised through the legislation and guidance outlined in this chapter will, for the most part, not result in any constraints. Other potential impacts which would result from its installation may come from the visual or cumulative impact. This will be dealt with in the specific sections on these kinds of impacts.

5. Proposals

- 5.1 The proposed turbines are to be either Enercon E-44 or EWT DW52. Further details of these models are given in the Associated Infrastructure Assessment
- 5.2 The unit is capable of producing up to 900kW. It has a storm control braking system to deal with extreme wind conditions (28-34m/s) to help prevent damage and shutdown. It has a three blade arrangement, which are formed of GRP Epoxy Resin and turn in a clockwise direction over an area of 1,521m².
- 5.3 The steel tower is accessed via a secured doorway at the base and ladder system within to reach the nacelle and rotor mechanics within.

Construction

- 5.4 The site will be accessed via the existing Devol Road path from Auchenlister Road. This may need some additional reinforcement but will follow the line of the existing route and should not be considered an additional impact. A linking surface will be required between the existing route and the base of each of the turbines. Details of this are described in the Associated Infrastructure Assessment.

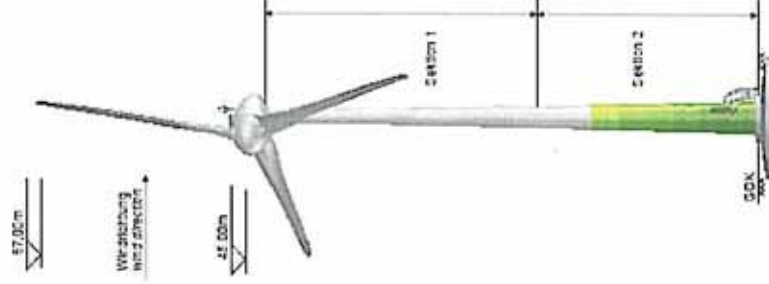
Connection

- 5.5 Exact details of connection are not available at the time of this study.



Gewichte und Abmessungen
Weights and Dimensions
E-44/S/44/2K/01

Page
1 of 1



GERÄTEGEWICHES GEWICHTE TOTAL WEIGHT FROM MANUFACTURE		57.00 m
NAHWEINDE DER GEHÄUSE NAC NACHT ABOVE HOUSING		45.00 m
TURMGEWICHTE UND FUNDAMENTGEWICHTE TOWER WEIGHTS AND FOUNDATION WEIGHTS		42.55 m
BAUPLAN / DESIGN		CONSTRUCTION 2166 TONNES
WINDKURVE WZ (DIRT)		*
WINDS GUSTS (IEC 51400-1)		100 m/s
AREAL DER SEKTIONEN / NUMBER OF SECTIONS		2 + Fundamentbereich 2 + FOUNDATION PART

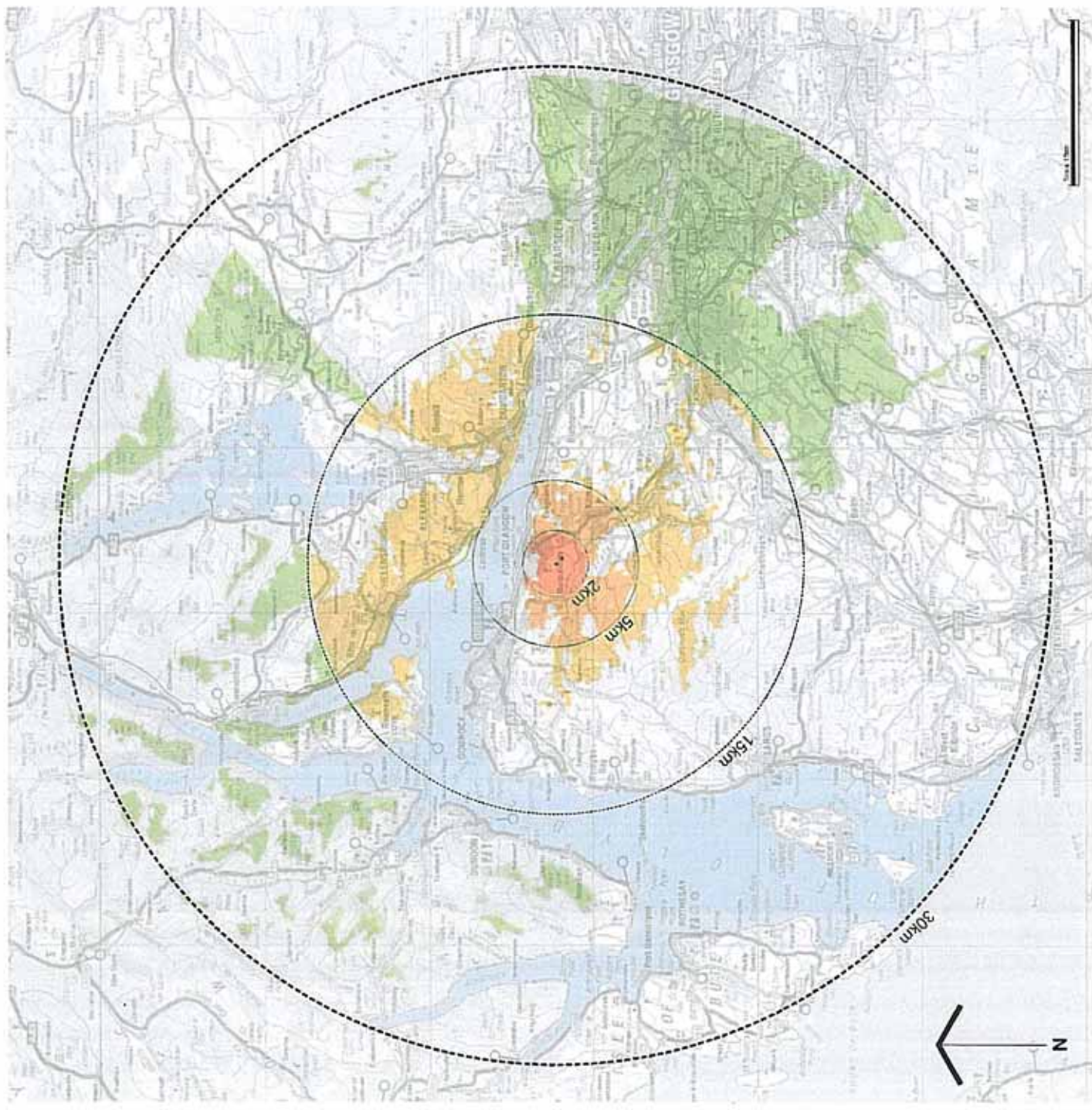
	Length in m	Diam in mm	Diam in ft	GEWICHT WEIGHT
SECTION 1 / SECTION 1	22.00	1.332 / 1.425	4.37 / 4.68	63.17
SECTION 2 / SECTION 2	21.55	2.120 / 2.576	6.95 / 8.43	63.23
Fundamentbereich / FOUNDATION PART	1.50	3.075	10.08	63.35
Gesamtgewicht Turm / total weight tower				63.54

Engineering, construction & installation of wind turbines
by the manufacturer and the contractor are not covered by this
document. The manufacturer's instructions should be followed.

- 0-2km to hub height
- 0-2km to Blade tip
- 2-5km to hub height
- 2-5km to Blade tip
- 5-15km to hub height
- 5-15km to Blade tip
- 15-30km to hub height
- 15-30km to Blade tip

★ Proposed Turbines

PRIESTSIDE FARM
 L3 ZTV to 30km
 December 2012
DAVID WILSON ASSOCIATES
LANDSCAPE ARCHITECTS



6. Visual Impact

- 6.1 The following is a study of the Zone of Theoretical Visibility (ZTV) that the proposed turbines would be anticipated to create, that is to say, the parcel of land from which the development would be seen. For the purposes of this study an initial radius of 30km has been taken as the visual study area with more detailed study area of 15km in all directions from the site was thereafter. This is considered a more than adequate radius to cover the likely impacts caused by wind turbines of this size. The analysis follows the method set out in "Guidelines for Landscape and Visual Assessment" Second Edition 2002, published by the Landscape Institute.
- 6.2 The ZTV has been established through ground model analysis using KTF 7.1 software produced by Key TERRA-FIRMA Ltd and topographical Land-Form PROFILE data supplied by Ordnance Survey. The 'Zone of Theoretical Visibility' output data show the areas from which the site can be seen based on the topography of the landscape alone. The ground model takes no account of settlements or built structures in the landscape and is a "Bare Earth" representation. As stated the turbines will sit at a ground level of 179m and reach to a height of 45m at the top of the tower and 67m at their blade tip. Both of these heights have been illustrated in the ZTV in order to give a more detailed impression of the degree to which the turbines would potentially be seen. The range at which the views will be experienced has also been incorporated.

- 6.3 Within this ZTV, there are areas, which will have a higher degree of visual sensitivity than others. Elements from which the site can be seen from are referred to in "Guidelines for Landscape and Visual Assessment" as visual receptors. These visual receptors have been looked at further, firstly, as a desktop study and then with on-site analysis.

ZTV to 30km

- 6.4 Drawing L3 shows the predicted theoretical visibility over a radius of 30km. It shows a theoretical visibility over much of Glasgow and the town of Paisley to the east. In reality such views will not be possible over this distance. The built form of these towns and all of the woodland, tree cover and structures in the landscape between these places will mean that virtually no views of the site over this distance will in fact be possible. In the event that any views are possible the distance from the turbine would mean that any impact would be negligible from a turbine of this height.

ZTV to 15km

- 6.5 Drawing L4 shows the theoretical visibility over a distance of 15km. On the south side of the Clyde Estuary the ZTV is restricted to mainly within 10km with a few exceptions to the south east along the Gryfe Valley. Theoretical visibility is shown on the land on the

south facing slopes of the Clyde Estuary on the northern bank. The topography screens the views of the site within the Vale of Leven which heads north from Dumbarton and links with Loch Lomond. This landform therefore restricts any potential views from the Loch Lomond area.

Visibility within 5km

- 6.7 The visual impact upon the wider area would appear to be fairly restricted in terms of the main settlement although Kilmacolm and the Bardsrainey area of Port Glasgow will be affected to some degree. Visual impact is greatly reduced through distance and significant impacts can be considered to lie mainly within a short distance from the turbines. These will be assessed in more detail in the following section
- 6.8 There are no significant villages or hamlets other than Port Glasgow, Greenock and Kilmacolm within 5km. Instead the landscape is filled with a series of small farmsteads and small holdings set within the undulations of the topography. These also tend to be located close to the two main roads through the area, the A761 and the B788. From these roads views are possible from various points but they are often screened by the presence of woodland, hedgerows and trees and by built forms as in Kilmacolm. A series of photo montages have been prepared to illustrate views from these roads.

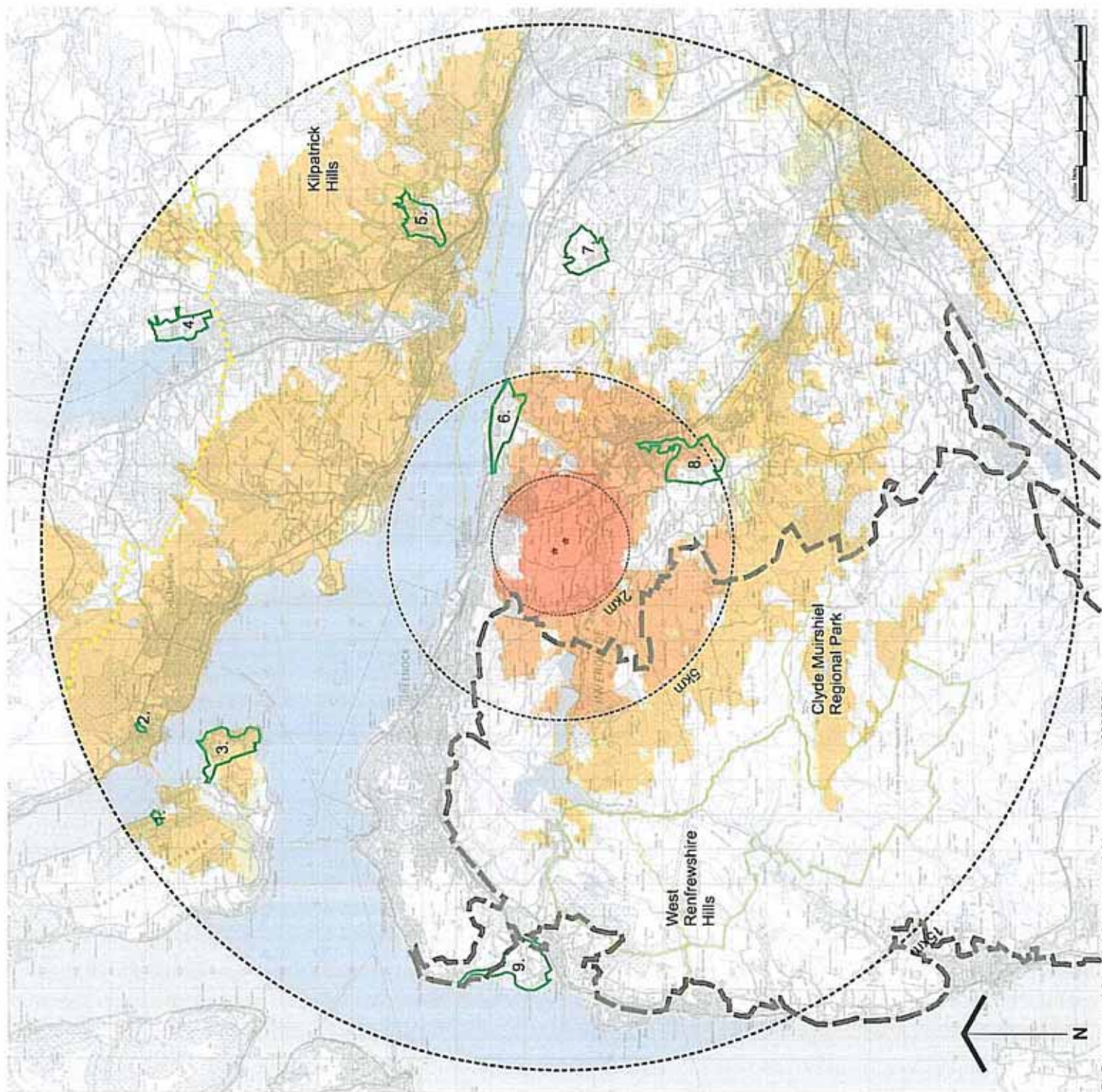
Receptors

- 6.9 An assessment of the impact upon the main settlements which lie within a 15km radius of the site has been made. Drawing L4 show the ZTV diagram which has been prepared using the method described previously. Coloured areas show a theoretical visibility of the turbines and clear areas show that views will not be possible from these locations. In addition to the settlements there are other features such as transport routes, core paths, regional parks and cycle networks which are also considered as receptors, requiring analysis.
- 6.10 The distance the receptor is from the turbines is first considered, as the level of impact is greatly affected by proximity to the source. Impacts reduce considerably the further the receptor is from the turbines as acknowledged in Visual Assessment of Wind Farms: Best Practice produced by SNH. This document sets out the range at which visual impacts are likely to occur and this is given as a general statement in the document. The example of the 100m turbine is used as a basis for the study. This states that at a range of 0-2km the turbine is "likely to be prominent feature", at 2-5km it is "Relatively Prominent", "Only Prominent in Clear Visibility" at a range of 5-15km and "Only seen in clear visibility beyond 15km". In reality this will depend on the circumstances of the

- 0-2km to hub height
- 0-2km to Blade tip
- 2-5km to hub height
- 2-5km to Blade tip
- 5-15km to hub height
- 5-15km to Blade tip

- AGLVs
- Clyde Muirshiel Regional Park
- National Park Boundary
- Garden and Designed Landscape
- Proposed Turbines

PRIESTSIDE FARM
 L4 ZTV to 15km
 December 2012
DAVID WILSON ASSOCIATES
LANDSCAPE ARCHITECTS



location and the relationship with the surrounding landscape but gives an indication of visual range of a turbine. For the purposes of clarity receptors have been divided into categories which reflect their range from the turbines so that the implications of the above can be considered at each stage of the assessment. It should be noted that all distances are taken from the nearest turbine to the nearest point of the receptor.

Determination of impact levels

6.11 Impacts reduce considerably the further the receptor is from the turbine. The sensitivity of the receptor is then considered to ascertain its susceptibility to impact. This is assessed through consideration of the nature of the receptor i.e. the number of people who might see a development and the reason they are there i.e. a passing view or a permanent residence. Permanent residences will have a potentially high sensitivity to visual impact in their primary views (and to a lesser extent in their secondary views) as will tourist attractions or landscapes with designated value. Transport routes, industrial complexes and farms may have less sensitivity and some conservation sites or historic features may have even less. The level of sensitivity will vary in each case and a brief explanation of each sensitivity classification is given for each receptor.

6.12 The impacts of the proposal are then assessed, firstly based on the ZTV model, and then through site study which will establish a predicted magnitude of change in the views from a receptor, should the development be implemented. This will be determined by assessing the existing view of the site from the receptor and predicting how this will change, taking into account the distance to the nearest turbine, the existing features and screening elements (or lack of), the orientation of primary views and the overall composition of the view in light of the proposal. A resultant predicted impact derived is the 'magnitude of change' caused by the proposal in relation to what exists at present.

6.13 The resulting impact takes into consideration the distance to the receptor, the sensitivity of the receptor and the magnitude of change caused by implementing the proposal. This is subject to the professional opinion of the landscape architect, through basing the assessment on physical data and on site observation. It is intended that the resultant impact will represent as true a reflection as is possible.

6.14 The level of sensitivity and the level of impact are each assessed according to one of six levels:

- Negligible or None
- Low
- Medium to Low
- Medium
- High to Medium
- High

6.15 The following receptors have been separated into 5 categories as listed below:

- o Farms, Dwellings and Small Hamlets
- o Towns and Villages
- o Transport Routes
- o Cultural Heritage
- o Nature Conservation and Recreation

Farms, Dwellings and Small Hamlets

6.16 Small farmsteads or rural households will be sensitive to changes in their permanent views although these may often be mitigated by the presence of agricultural outbuildings and a general anticipation of industrial or agricultural activity across the landscape.

0-2km from Development

6.17 **Cunston Cottage** - 675m from closest turbines

Sensitivity – As a residential dwelling this receptor will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This receptor lies on the lower ground as it falls away to the east. It faces eastwards away from the turbines so primary views will not be affected however there will be some views of the turbines from the rear of the property although these will be on higher ground. Magnitude of change will be **medium**.

Resultant Impact – Medium

6.18 **Priestside Farm** - 697m from closest turbines

Sensitivity – As a working farm, this receptor will have a **medium** sensitivity to visual impacts upon primary views. The turbines will lie on the land of the farm owners who are the proposers of the development. This will have a considerable mitigating effect upon their attitudes and perception of impact.

Magnitude of Change – This farm lies to the south, again on lower ground at the foot of a steep drop in level. The farmhouse lies on the southside of the farm complex and views of the turbines will be screened partially by the farm outbuildings and group of trees on the northside. The turbines position on the higher ground will mean that some views will remain from the rear. The Magnitude of change will be **medium**. Photo montage 6 shows the view from this approximate location.

Resultant Impact - Medium

6.19 **High Mathermock** - 786m from closest turbines

Sensitivity – As a working farm, this receptor will have a **medium** sensitivity to visual impacts upon primary views.

Magnitude of Change – This farm sits to the south across Auchentiber Rd. It will have clear views of the turbines upon the hill to the north. Magnitude of change will be **high**.

Resultant Impact - Medium

6.20 **Pennyfersal** - 1014m from closest turbines

Sensitivity – As a working farm, this receptor will have a **medium** sensitivity to visual impacts upon primary views.

Magnitude of Change – This farm sits to the south east facing away from the turbines. These will be over 1km away on the higher ground to the side of the dwelling. Magnitude of change will be **medium**.

Resultant Impact - Medium

6.21 **Cauldside** - 1390m from closest turbines

Sensitivity – As a residential dwelling this receptor will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This residential property faces northwards and will have clear views of the turbines. Mature gardens surrounding the cottage will provide some degree of mitigation. Magnitude of change will be **high**.

Resultant Impact - High

6.22 **Horsecraig (the Haven)** - 1615m from closest turbines

Sensitivity – This receptor is a retreat for those recovering from addictions. It will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This receptor will have clear views across the countryside to the turbines. Magnitude of change will be **high**.

Resultant Impact – High

6.23 **Auchenfoyle** - 1820m from closest turbines

Sensitivity – As a combination of residential dwellings and working farm this cluster of receptors will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This receptor lies to the south west in the low lying ground of the Gryfe Valley. The dwellings lie on the west side of the farm complex with a large barns and outbuildings on the east side. These will partially screen views of the turbines and mitigate impacts. Magnitude of change will be **medium**.

Resultant Impact – Medium

6.24 **Auchentiber** - 1579m from closest turbines

Sensitivity – As a working farm, this receptor will have a **medium** sensitivity to visual impacts upon primary views.

Magnitude of Change – This farm lies to the west. The farm outbuildings will screen views to the north east and west from the house, including views towards the turbines. Magnitude of change will be **low**.

Resultant Impact - Low

6.25 **Harelaw** - 1608m from closest turbines

Sensitivity – This receptor is now derelict and has not been assessed further.

Resultant Impact - None

6.26 **West Kilbride** - 906m from closest turbines

Sensitivity – As a residential dwelling this receptor will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This farmhouse dwelling lies to the east and faces west looking towards the turbines. Magnitude of change will be **high**.

Resultant Impact - High

6.27 **Gryfeside** - 1230m from closest turbines

Sensitivity – As a working farm, this receptor will have a **medium** sensitivity to visual impacts upon primary views.

Magnitude of Change – This farm lies to the south east and the farmhouse is surrounded by outbuildings. Some views will likely be possible of the turbines on the raised ground. Magnitude of change will be **medium**.

Resultant Impact - Medium

6.28 **Auchenbothie Mains** - 1828m from closest turbines

Sensitivity – As a combination of residential dwellings and working farm this cluster of receptors will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – The residential dwellings face to the east so primary views will not be affected. Some views will be possible from the properties and their immediate vicinity however. Magnitude of change will be **medium**.

Resultant Impact - Medium

6.29 **Strathgryfe** - 1760m from closest turbines

Sensitivity – This receptor is a residential dwelling with associated equestrian business and limited agriculture. It will have a **medium** sensitivity to visual impacts upon primary views.

Magnitude of Change – This receptor will have views across the landscape to the turbines although these will be screened to an extent by the tree cover associated with the Gryfe Valley. Magnitude of change will be **medium**.

Resultant Impact - Medium

6.30 **Faulds** - 1975m from closest turbines

Sensitivity – A former working farm with elements of outbuildings remaining, it is now a residential receptor and will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – The ZTV shows that views of the turbines will be possible from this receptor however on site observation demonstrates that this will not be possible from ground level due to the topography and screening vegetation. Any views which would be possible would be from upper floor windows and likely to be of the blades only. Magnitude of change will be **low**.

Resultant Impact - Low

6.31 **High Auchenteck** - 944m from closest turbines

Sensitivity – As a former working farm with elements of outbuildings remaining, it is now a residential receptor and will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – Due to topographical screening, magnitude of change will be **low**.

Resultant Impact - Low

6.32 **East Dougliehill** - 1644m from closest turbines

Sensitivity – As a residential dwelling this receptor will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This receptor sits on the edge of Port Glasgow and will be mostly screened from views by the topography with only views of the blade tips likely to be possible if at all. Mature tree cover along the south east boundary will add to this screening effect. Magnitude of change will be **negligible**.

Resultant Impact - Negligible

6.33 **South Craigmearloch** - 1870m from closest turbines

Sensitivity – As a residential dwelling this receptor will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This property lies to the east adjacent to the A761. It is orientated east with a tall hedge and outbuilding on the western side. It is possible that some views will remain from the property however. Magnitude of change will be **medium**.

Resultant Impact - Medium

6.34 **Craigmearloch** - 1950m from closest turbines

Sensitivity – As a small cluster of residential dwellings this receptor will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This receptor also lies to the east adjacent to the A761 although further north. This means that the raised topography of Craigmearloch Hill and wood will screen views to a greater degree. The properties also sit amid mature tree cover which will further screen direct views of the turbines from the houses. Magnitude of change will be **low**.

Resultant Impact - Low

6.35 **Auchenfoil Cottage** - 1914m from closest turbines

Sensitivity – As a residential dwelling this receptor will have a **high** sensitivity to visual impacts upon primary views.

Magnitude of Change – This receptor lies to the west along the Gryfe Valley. It faces towards the site but the large area of woodland between it and the proposed turbines will give a degree of screening. Some views of the blades may still be visible however. Magnitude of change will be **medium**.

Resultant Impact - Medium

Beyond 2km from Development

6.36 At this range there are many farms and dwellings within the landscape although these are generally restricted to the low lying valley floors. These small holdings generally tend to be sheltered and often lie in tree covered surroundings. Beyond this range there continue to be scattered dwellings and farms but the distance and sheltered locations mean that impacts will be of a lower level.

Conclusions

6.37 There are a number of scattered farms and dwelling within 2km of the proposed site around the Gryfe Valley. Many of these are working farms with a limited sensitivity however and relatively few of these are within 1km of the turbines. Most sit in sheltered

areas with tree cover around them or within the landscape between them and the turbines, which give a degree of screening. There will be some impact however on some of the receptors.

Towns and Villages

6.38 These receptor types refer to larger rural settlements, villages and towns. These groups of receptors are made up of a range of individual receptors of significant levels of sensitivity including many listed buildings. Sensitivity will therefore be high. This is generally mitigated by the increase in density of screening elements within these types of receptors such as tree cover and built structures. Often they are also associated with water courses and historically are located in sheltered niches in the landscape helping to further limit views in some directions.

0-2km from Development

6.39 **Port Glasgow** – 1.1km from closest turbine

Sensitivity – Port Glasgow is a fairly large ribbon development settlement which stretches along the slopes of the southern side of the Clyde Estuary. As a result of this position the orientation is generally northwards with the backs of houses towards the slope behind, away from the turbines. Its industrial past and subsequent decline have left much of the town in a poor condition with a proportion of the old tenement and industrial buildings left derelict. In spite of this, as a residential settlement, there is **high** sensitivity to potential changes to the permanent views which people may experience from their homes.

Magnitude of change – The character of the setting is fairly poor and therefore any impact on it is liable to be limited however the ZTV shows that only the south western section of the town at Bardrainey is affected. This sits in an area where the land falls away rather than being separated by the ridge line which screens the rest of Port Glasgow. Views of the turbines are likely from houses on the southern edge of the town but views will quickly become screened by the buildings between. Views from the A761 become quickly reduced and disappear beyond Newark Primary School. Magnitude of change will be **medium**. Photo montage 7 shows the view from this approximate location.

Resultant Impact - **Medium**

2-5km from Development

6.40 **Kilmacolm** – 2.5km from closest turbine

Sensitivity – Kilmacolm is a fairly opulent large village set in the Gryffe Valley. Much of it has a Victorian or Edwardian character and the south eastern portion of the village has been given conservation area status. It will have a **high** sensitivity to visual impact.

Magnitude of change – This historic and rural character makes the village sensitive to impacts therefore any change in the setting is liable to be of a higher magnitude. The ZTV shows extensive views of the wind turbines. In reality, from within the village views will be sporadic. Kilmacolm has a high degree of tree cover throughout as a result of its characteristic large houses set in extensive mature gardens. As a result, the tree cover and buildings of the village itself will screen the turbines from within. What possible views there are will mainly be in the north part of the village and to the east as the landform rises slightly on the valley side. These views will be reduced in frequency as one travels south as obstacles and distance help to reduce visual impact. Kilmacolm is the settlement most likely to be visually impacted by the development but an onsite study has determined that there are few places within the village itself where views will be possible from street level, particularly in the conservation area which is located on the opposite side of the village from the turbines. Magnitude of change will be **medium**

Resultant Impact - **Medium**

5-15km from Development

6.41 **Cardross** – 5.3km from closest turbine

Sensitivity – this small village sits on the flat plains of the Clyde Estuary north of the proposed site. It has a fairly historic character but its flat topography means that views out into the wider landscape are restricted to the periphery although the expanse of the Clyde Estuary to the south means that these views extend out towards Port Glasgow. It will have a **high** sensitivity to visual impact.

Magnitude of change - Only partial views will be possible from Cardross as the ridge line between the site and Port Glasgow will help to screen the lower half of the turbines but the blades may be visible on the skyline. Again Cardross has a fair degree of woodland cover which helps to screen it as do the buildings. Views will be over 5-6km which will help to mitigate the impact but these may be fairly clear from the southern edge. Magnitude of change will be **low**

Resultant Impact - **Low**

6.42 **Quarriers Village** – 5.5km from closest turbine

Sensitivity – Quarriers Village is a historic village set low in the Gryffe Valley. As a mainly residential settlement it will have a **high** sensitivity to visual impacts on permanent views.

Magnitude of change – The low lying position of the settlement in the Gryfe Valley and the high degree of tree cover means that views are unlikely to be seen from within the village. Any views which could be possible would fall upon the northern edge of the settlement but this remains unlikely. Magnitude of change will be **low**.

Resultant Impact - **Low**

6.43 **Dumbarton** – 6km from closest turbine

Sensitivity – Dumbarton sits on the north side of the Clyde Estuary where the River Leven emerges from the Vale of Leven. This joining of two valleys creates a wide, inverted ‘T’ shaped topography which creates a diversity of characters within the town. There is a large proportion of social housing in the town and some tall flat blocks. The imposing Dumbarton rock sits on the coast line with Dumbarton Castle on top screening some views from the town. Access to the river is generally via this small stretch of coast with a rather industrial landscape making up the remainder of the waterfront. It will have a **high** sensitivity to visual impact.

Magnitude of change - From across the water much of Dumbarton is predicted to have views of the site. The drop in the land which exists to the east of Port Glasgow means that views of the turbines will open up. Again views will be screened by built form in the town but some will still be possible. These will mainly be on areas at the waterfront such as at the Castle. The Town Centre is protected from views of the site by the wooded estuary of the River Leven which emerges here and wraps around the centre, enclosing it from view. Magnitude of change will be **medium**.

Resultant Impact - **Medium**

6.44 **Bridge of Weir** – 7.8km from closest turbine

Sensitivity – Bridge of Weir also sits within the Gryfe Valley. The character is not as historical as Kilmacolm although there are some older buildings around the centre. The village has a more enclosed nature within the Gryfe valley with fewer extensive views into the surrounding countryside. A high degree of tree cover on the periphery also helps to contain views. As a residential area however there is again **high** potential sensitivity.

Magnitude of change - The ZTV shows Bridge of Weir as having views of the site from places. These are likely to be very few if at all as the Gryfe valley along which views are predicted to be possible is very well wooded and tree cover will screen the majority of views over any distance. The most likely location of any views will be when leaving the north side of the village on the A761 where the landscape briefly allows. A distance of 7.8-10km will also mean that any change in views of the turbines will be of **negligible** magnitude.

Resultant Impact – **Negligible**

6.45 **Helensburgh & Rhu** – 9.1km from closest turbine

Sensitivity – Helensburgh is of a similar size to Dumbarton but has a more distinct character. It is built on a grid formation of roads crossing the slope northwards from the Clyde and houses orientated southward towards the shore. As an opulent residential area and tourist destination the waterfront at Helensburgh is addressed with parks and walkways and shops fronting on to the esplanade. It will have a **high** sensitivity to visual impact.

Magnitude of change - The wind turbines are predicted to be visible from the whole of Helensburgh but again the buildings of the town will help to reduce views. This will be further mitigated by the 9-14km distance and the fact that the site is somewhat to the east rather than directly across the estuary from the settlement. Some views are likely to be possible however. Magnitude of change will be **low**.

Resultant impact - **Low**

6.46 **Johnstone** – 12.6km from closest turbine

Sensitivity – Johnstone is similar in character to Bridge of Weir but within a more open landscape and closer to the Glasgow conurbation. It will have a **high** sensitivity to visual impact.

Magnitude of change - Views are predicted from certain areas of Johnstone from the ZTV. In reality views are unlikely to be possible due to physical elements in the landscape and the distance of 12-15km between the town and the turbine. Magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

6.47 **Bonhill** – 9.3km from closest turbine

Sensitivity – It will have a **high** sensitivity to visual impact.

Magnitude of change – This settlement lies to the north east within the Vale of Leven. It is generally orientated westwards across the Vale of Leven with limited views southwards. Some views are likely but distance will be a mitigating factor. Magnitude of change will be **low**

Resultant Impact - **Low**

6.48 **Linwood** – 11.8km from closest turbine

Sensitivity – It will have a **high** sensitivity to visual impact.

Magnitude of change – This settlement lies far to the south east. The distance and undulating nature of the landscape combined with screening elements in the landscape

will mean that views are very unlikely from this settlement and any which would be possible would be of a **negligible** magnitude of change.

Resultant Impact - **Negligible**

6.49 Erskine – 12.3km from closest turbine

Sensitivity – It will have a **high** sensitivity to visual impact.

Magnitude of change – The ZTV predicts that some visibility may be possible from a small section of Erskine. In reality this is extremely unlikely and the distance would mean that any views would be of little consequence. Magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

6.50 Old Kirkpartick & Bowling – 9.3km from closest turbine

Sensitivity – It will have a **high** sensitivity to visual impact.

Magnitude of change – This small settlement lies along the edge of the Clyde to the north east. Some views may be possible from some areas of the settlement but these are likely to only be from the southern edge and only of the blades. Magnitude of change will be **low**

Resultant Impact - **Low**

6.51 Roseneath – 12.9km from closest turbine

Sensitivity – It will have a **high** sensitivity to visual impact.

Magnitude of change – This small settlement lies within Gare Loch and is orientated north east with the turbines to the south east. It is possible that some scattered views may be possible from a few locations but the distance and angle of view would mean that the magnitude of change will be **negligible**

Resultant Impact – **Negligible**

Conclusions

6.52 The majority of settlements within the ZTV will have very limited views of the turbines which will be mitigated by the distances between them and the subject. The two closest settlements are Port Glasgow and Kilmacolm and these are the settlements with the greatest potential for visual impact. The topography and density of development within these settlements, along with tree cover in the case of Kilmacolm, will generally mean that any visual impacts upon them will fall upon the edges of the settlements closest to the turbines. It should be noted that within this highly populated area with several towns and large villages many will have no views of the turbines at all. Langbank, Balloch,

Alexandria, Renton, Houston, Gourrock, Greenock, Bishopston, Kilbarchan, Inverkip, Brookfield, Kilcreggan, Lochwinnoch, Howwood, Skelmorlie and Wemyss Bay all lie within the 15km study area but will have no views of the proposed development.

Transport Routes

6.53 Receptors travelling along main transport routes will experience a constantly changing view of the surrounding countryside. Some views will be brief and others may change more gradually over distance but all will generally be briefly experienced and the degree of impact will alter quickly as progress is made on the route. Orientation relative to direction of travel can also be a factor as views which fall directly in the line of sight will be more noticeable than those lying perpendicular to the direction of travel.

0-2km from Development

6.54 Auchentiber Road – 620m from closest turbine

Sensitivity – This minor country road will have a **low** sensitivity to visual impact.

Magnitude of change – This road runs through the Gryfe Valley to the south of the site. It turns through the topography which occasionally screens the turbines and at the closest points the difference in elevation between it and the turbines helps to mitigate potential impacts. Views to the turbines along this road will be clear for the majority of the length however. Magnitude of change will be **high**. Photo montage 6 shows the view from this transport route.

Resultant Impact - **Low**

6.55 Auchentiber Road – 1km from closest turbine

Sensitivity – This minor country road will have a **low** sensitivity to visual impact.

Magnitude of change – This road runs north to the southern end of Port Glasgow before descending into the town itself. The stretch between Auchentiber road and Port Glasgow will have views across to the turbines broken up occasionally by vegetation at the road side. Magnitude of change will be **high**. Photo montage 7 shows the view from this transport route.

Resultant Impact - **Low**

6.56 A761 – 1.8km from closest turbine

Sensitivity – This fairly busy road links Port Glasgow with Kilmacolm, Bridge of Weir and settlements to the south. This will have a **medium** sensitivity.

Magnitude of change – There will be views of the turbines from patches on this road from the southern edge of Port Glasgow and Kilmacolm. Some views will be possible from within Port Glasgow from the roundabout at Newark Primary School southwards although these will frequently be screened by the built development until outwith the town. After a brief stretch the landform will screen any views from this road as it rises up at Craigmaitloch Wood. Views will begin again around South Craigmaitloch until the edge of Kilmacolm where the tree cover along the road edge will begin to screen views before entering the settlement where views will be entirely screened from road level. South of Kilmacolm some brief views may be possible but the brevity and distance will mean that these are of little impact. Overall Magnitude of change upon this road can be considered **medium to low**. This is illustrated in photo montages 1, 2 and 3.

Resultant Impact - **Medium to Low**

6.57 **B788** – 1.8km from closest turbine

Sensitivity – This country road will have a **medium to low** sensitivity.

Magnitude of change – This road runs from the south of Kilmacolm to Greenock in the northwest. It will be largely screened by the topography and vegetation until it crests the hill and begins to descend into the Gryfe Valley at the entrance to Horsecraigs. This is photo montage location 4. This will continue into the valley and up the rise towards the north. Views will be possible to the east, away from the direction of travel and direct lines of sight, as far as Devol Moor Electricity Sub-station. Photo montage 5 shows the view from this approximate location. Beyond this partially screened views may be possible over the landscape but these will soon be screened as the landscape descends again into Greenock. The great majority of this road will not have any views. Magnitude of change will **low**.

Resultant Impact - **Low**

2-5km from Development

6.58 **B786** – 3.2km from closest turbine

Sensitivity – This country road will have a **medium to low** sensitivity.

Magnitude of change – This road links Kilmacolm with Lochwinnoch to the south. Views for the closest parts are not possible due to screening elements in the landscape. Some scattered views may be possible from further south where the topography allows but the magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

5-15km from Development

6.59 **A814** – 5.2km from closest turbine

Sensitivity – This road follows the north coast of the Clyde Estuary linking through to Helensburgh and beyond. It will have a **medium** sensitivity.

Magnitude of change – The road runs east to west along the coast and will have views across the Clyde Estuary to the site from regular stretches broken up by development and tree cover. The turbines will be to the south away from the direction of travel in either direction and the distance will have a considerable mitigating effect. Magnitude of change will be **low**.

Resultant Impact - **Low**

6.60 **A82** – 8.1km from closest turbine

Sensitivity – This busy road links Glasgow with the west coast and will be of **medium** sensitivity.

Magnitude of change – The busy road is predicted to have only small pockets of visibility. These will be brief and of a **negligible** magnitude of change at this range.

Resultant Impact - **Negligible**

6.61 **A813** – 9km from closest turbine

Sensitivity – This road runs along the east side of the Vale of Leven towards Loch Lomond from Dumbarton. It will be of **medium** sensitivity.

Magnitude of change – The ZTV shows only scattered pockets of visibility from this road and often amongst the built up area of Alexandria and Bonhill. Magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

6.62 **M8** – 7.3km from closest turbine

Sensitivity – This major transport route will have a **high to medium** sensitivity to visual impact.

Magnitude of change – The ZTV shows scattered patches of possible visibility of the blades at a range of 14-15km. Magnitude of change will be **negligible**

Resultant Impact – **Negligible**

6.63 **A737** – 12.4km from closest turbine

Sensitivity – This major road links North Ayrshire which Glasgow via the M8 and will have a **medium** sensitivity to visual impact.

Magnitude of change – Again the ZTV shows scattered patches of views of the blades at 14-15km close to Johnstone. Magnitude of change will be **negligible**

Resultant Impact - **Negligible**

6.64 **A726** – 12.6km from closest turbine

Sensitivity – This busy road will have a **medium** sensitivity to visual impact.

Magnitude of change – Again only scattered views of the blades are predicted at a wide range. Magnitude of change will be **negligible**

Resultant Impact - **Negligible**

6.65 **A817** – 14km from closest turbine

Sensitivity – This road passes over the high ground far to the north west. It will have a **medium** sensitivity to visual impact.

Magnitude of change – There will be some views possible from this road but over distance. Magnitude of change will be **low**

Resultant Impact - **Low**

Conclusions

6.66 There will only be any notable visual impacts upon transport receptors from the roads within 5km. These will be scattered and often mitigated by the topography, the meandering courses through the valley landscape and a high level of vegetation by roadsides in the form of woodland, tree cover or hedgerows. Views within 2km will be clearer but there are fewer significant receptors at this range. It should be noted that two of the main receptors in this category - the A8 and main railway line will not be affected as they run in the coastal land on the southern bank of the Clyde Estuary where the topography screens lines of sight.

Cultural Heritage

6.67 Cultural heritage receptors can be historical elements within the landscape such as Scheduled Monuments, Listed Buildings or Gardens and Designed Landscapes or can simply be significant local features which contribute to the character of the study area. Levels of sensitivity will vary greatly depending on the nature of the receptor and may not be related to their classification but rather their function, attraction to visitors and the importance of "setting" to their character. All cultural heritage receptors are identified in drawing L1 Location and Context.

0-2km from Development

6.68 **Craigmarloch Hill Fort** – 1.6km from closest turbine

Sensitivity – This receptor is an archaeological feature which exists as little more than an earth formation amid some woodland. Views out to sea and over land from it had a historic relevance but it is unlikely to be of significance in modern times as its low profile is unlikely to draw many visitors and there is no defined access path. It will have a **low** sensitivity to visual impact.

Magnitude of change – The hill fort is surrounded by tree cover but as it sits on the summit of a hill it will have views to the turbines across the lower land to the west. Magnitude of change will be **high to medium**.

Resultant Impact – **Low**

2-5km from Development

6.69 **Duchal House** – 3.6 km from closest turbine

Sensitivity – Historic Scotland records the site as – "*Duchal (House) is a good example of a formal late 17th/early 18th century designed landscape into which later overlays have been well integrated. (It is) A medium-sized, formal landscape, characteristic of the late 17th/early 18th century and incorporating later 18th and 19th century modifications.*" It will have a **high** sensitivity to visual impact

Magnitude of change – The ZTV shows the west half of the estate will not have views because of the topography of the valley. The eastern half will be largely screened by the presence of Kilmacolm and tree cover in and around the settlement and valley. Some views may be possible from a few locations but these will generally be of a **low** magnitude of change.

Resultant Impact - **Low**

6.70 **Findlaystone House** – 3km from closest turbine

Sensitivity – Historic Scotland records the site as – "*This impressive designed landscape comprises of very attractive gardens, important architectural features, valuable wildlife habitats, and trees and parkland that all together make a big contribution to the local scenery.*" It will have a **high** sensitivity to visual impact

Magnitude of change – The ZTV shows only a small area of the estate to have any potential views. This falls across a wooded area where viewing opportunities do not generally exist. Magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

5-15km from Development

6.71 **Overtoun House** – 9.2 km from closest turbine

Sensitivity – Overtoun House is currently a Christian Centre for Hope and Healing. The house is a listed Baronial Building around 150 years old and sits in fairly extensive grounds. Much of these grounds are tree covered and sit in a small valley which helps to enclose them and screen them from views. The house itself however is intended to take advantage of the views across the Clyde Estuary. In its function as a retreat the centre is generally unlikely to have a significant population of residents at any time. It is not a tourist attraction with a high turnover of visitors as some other historic estates and as such the sensitivity can be considered as **low**.

Magnitude of change – The ZTV shows that the majority of the estate will have no views of the turbine with only the highest section, where the house sits, having any visual impact. A distance of 9.2km to the turbines will mean that visual impacts from the two turbines will be low. Magnitude of change will be **low**.

Resultant Impact - **Low**

6.72 **Gareloch House** – 14.2km from closest turbine

Sensitivity – Historic Scotland records the site as – “The gardens form an impressive setting for the category A listed Gareloch House and contain a collection of notable specimen trees.” It will have a **high** sensitivity to visual impact

Magnitude of change – The distance, orientation and screening elements will mean that views are unlikely. Magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

6.73 **Glenarn** – 14km from closest turbine

Sensitivity – Historic Scotland records the site as – “A very attractive garden incorporating dramatic level changes and a dell, Glenarn is best known for the species rhododendron collection, many of which are the progeny of seed collected by the plant hunter and Glasgow University Regius Professor of Botany, William Hooker.” It will have a **high** sensitivity to visual impact

Magnitude of change – The distance, orientation and screening elements will mean that views are unlikely. Magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

6.74 **Rosneath** – 10km from closest turbine

Sensitivity – Historic Scotland records the site as – “Unfortunately much degraded today, the designed landscape at Rosneath still has historical value and does play a part in its contribution to local scenery. It will have a **low** sensitivity to visual impact

Magnitude of change – Distance to the site and partial screening will mean that magnitude of change will be **low**.

Resultant Impact – **Low**

Conclusions

6.75 The long term settlement of the area around the Clyde Estuary means that there is a rich history within the landscape of the study area. This takes various forms (in varying conditions) and there are many examples of Gardens and Designed Landscapes. Of those affected by the ZTV many have only partial visibility and most are on the out ranges from the turbines. There are two within 5km of the site but these will have very limited visibility of the turbines due to primarily the topography and secondarily the high level of tree cover which tends to characterise such landscapes.

Nature Conservation and Recreation

6.76 Nature Conservation Sites are usually designated for their ecological or geological features or for their aesthetic value. Generally the former types of sites have a low sensitivity to visual impact but often have the potential to draw visitors to them and so should be considered. The latter types of sites such as National Scenic Areas or Areas of Great Landscape Value have a high sensitivity to visual impact as they have been designated in order to preserve their visual qualities. This is often in regard to their capacity to accommodate development whilst preserving their own aesthetic qualities but the wider impacts upon them should also be considered. There is frequently commonality with recreational opportunities in the landscape and these have been assessed in the same section.

0-2km from Development

6.77 **Devon Road S.I.N.C.** – 0m from closest turbine

Sensitivity – This designation is a conservation one and is of very **low** sensitivity to visual impact.

Magnitude of change – As the turbines will sit within the SINC magnitude of change will be **high**.

Resultant Impact - **Low**

6.78 **Clyde Muirshiel Regional Park** – 1.66km from closest turbine (ranging out to 27km)

Sensitivity – Clyde Muirshiel Regional Park covers a vast area to the west of the site which stretches from the south of Greenock and Gourrock as far as West Kilbride to the south and the coast in the west. It covers an area of 108 square miles and contains a diverse range of landscape types. The Park has produced its own “Framework

Guidance Document on windfarm development proposals affecting Clyde Muirshiel Regional Park" (Feb 2008) in order to address the pressures for development across the large and exposed piece of land. In conclusion the document states:

"The Park Authority urges a precautionary approach to major developments and advocates a presumption against developments that would have adverse effects on the Park and its aims. This approach is consistent with the policies of planning authorities."

There is a clear sensitivity to wind farm development within the Regional Park and to a degree in the areas surrounding landscape. This can be further mitigated by the scale of the development proposed i.e. small cluster of turbines as opposed to a wind farm. Sensitivity is therefore considered **medium**.

Magnitude of change – The close proximity of a section of the Regional Park which extends across the B788 towards the site and land to the west of this will have reasonably clear views of the turbines as will sections of higher land to the south west. These views are most prevalent at around 5km and diminish before disappearing over 10km. As the highest land is affected human presence at these locations will be relatively limited. The land to the west of the site is classified as being category 5 value in the framework report although this is rated in terms of its relevance to the rest of the regional park (the highest being 6) rather than to the wider landscape value. It is presumably based on its suitability to accommodate wind farm development.

The proposed turbines will have an impact upon the closest sections of the parks and on the higher ground to the south west but visual receptors within these sections will be limited and the great majority of the area will not be impacted in any way. Those viewers within the ZTV will however experience the impacts fairly highly in the closest parts due to the recreational and conservalational nature of the setting. It should be noted that none of the visitor centres within the park will be affected and all lie outwith the ZTV. Magnitude of change will be **low**.

Resultant Impact – **Low**

6.79 **Devol Road Core Path (37B)** – 530m from closest turbine

Sensitivity – this is a locally designated core path which links Port Glasgow to the countryside to the south via the golf course. There is no specific view or attraction related to the path so sensitivity can be considered **low**.

Magnitude of change – The path passes by the west at a distance of 530m at the closest point and the farm track will form the access route to service the turbine. Impact on this path can be seen as being high therefore. Magnitude of change will be **medium**.

Resultant Impact – **Low**

6.80 **National Cycle Network Route 75 (Core Path 57D)** – 960m from closest turbine

Sensitivity – This routes runs through the study area and covers a vast route from Johnstone on the south east through to Gourrock in the northwest. It is a nationally significant route. The route runs through a diverse range of landscape types which change constantly to the viewer which makes the sensitivity to visual elements greatly reduced and considered **low to medium**.

Magnitude of change – The route runs along a dismantled railway line from Kilmacolm to Port Glasgow, incorporating Core Path 57D, and it is over this section that views will be possible of the turbines. At its closest point the turbine will be 960m away and the section in question will run for approximately 3km. Views will be fairly clear within this section but will be seen within a wider context of the route and amid other elements in the landscape such as pylons. Impact in the wider context of this route can be considered **medium**.

Resultant Impact – **Low to Medium**

6.81 **Auchentiber Rd Core Path (29D)** – 620m from closest turbine

Sensitivity – As a core path this route will have a **medium** sensitivity

Magnitude of change – As in the earlier assessment of Auchentiber Road, magnitude of change will be **high**.

Resultant Impact - **medium**

6.82 **Core Path 43** – 770m from closest turbine

Sensitivity – As a core path this route will have a **medium** sensitivity

Magnitude of change – This path will have partial views and magnitude of change will be **low**.

Resultant Impact - **Low**

6.83 **Core Path 44** – 1.12km from closest turbine

Sensitivity – As a core path this route will have a **medium** sensitivity

Magnitude of change – Some views will be possible from this path. Magnitude of change will be **medium**.

Resultant Impact - **Medium**

2-5km from Development

6.84 **Corlick Hill Core Path (32A, B&C)** – 2.7km from closest turbine

Sensitivity – This path links Greenock with the peak of Corlick Hill from the west side. As the hill is close to a populated area and has clear views across the Clyde Estuary it is

likely to be fairly popular and therefore sensitive to change however it also overlooks a very developed landscape already, so sensitivity can be considered **medium**.

Magnitude of change – Views of the turbines from the path will be screened by the hill itself but views will be fairly clear from the summit. The main focus of viewers will be across the Clyde Estuary towards the north shore and Ben Lomond so the critical view will not be impacted by the proposals. Magnitude of change will be **low**.

Resultant Impact - **Low**

5-15km from Development

6.85 Kilpartick Hills (AGLV) – 9.8km from closest turbine

Sensitivity – This designation applies to the land to the north east, above Clydebank and Old Kilpartick. It is designated more for its attractive qualities but there are opportunities for recreation within the area too. It will have a **medium** sensitivity to visual impact.

Magnitude of change – The ZTV shows that views will only be possible from the south western slopes of the hills. There are few paths of viewing opportunities across this area. Magnitude of change will be **negligible**.

Resultant Impact - **Low**

6.86 West Renfrewshire Hills (AGLV) – 7.4km from closest turbine

Sensitivity – This designation allies to the raised landscape to the south west within Clyde Muirshiel Country Park. Again it is based primarily for the aesthetic qualities possessed by the landscape but again recreational activities within it and views out from the area will give a sensitivity which is of a **medium** level.

Magnitude of change – The ZTV shows only two very small areas which are likely to have any views of the turbines from within this area. Magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

6.87 Loch Lomond and Trossach National Park– 10.2km from closest turbine

Sensitivity – The National Park Area covers a wider section of the west of Scotland and has been set up to safeguard the landscape of Loch Lomond and The Trossach Hills which are regarded for their great beauty. It has a **high** sensitivity.

Magnitude of change – The National Park only enters the north of the study area and the topography means that only a small area of the ZTV falls across the high ground on the very southern edge of the receptor. Magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

6.88 Loch Lomond National Scenic Area– 10.2km from closest turbine

Sensitivity – This designation lies within the National Park but applies only to the landscape around Loch Lomond. It will have a **high** sensitivity.

Magnitude of change –The ZTV shows very slight potential visibility but in reality this will have a magnitude of change will be **negligible**.

Resultant Impact - **Negligible**

Conclusions

6.89 The varied landscape of the study area has both settlements on the low sheltered land and conservation designations on the more remote and higher ground to the north and south west. The site has limited visual impact upon these designated landscapes and indeed occupies one of the few elevated areas within the wider landscape which will have such a limited impact upon these landscape designations.

Overall Conclusions

Impact from 0 to 2km

6.90 Visual impact over the 2km range will be restricted to scattered farmsteads, a few rural homesteads, some minor roads and the southern edge of Port Glasgow. There will inevitably be some visual impact caused by the proposals at this close proximity. The turbines will be most visible within the Gryfe Valley immediately to the south and will reduce in visibility outwith this feature as the topography screens more of the towers. A large percentage of the residents within this 2km range will have no views of the turbines due to the screening topography associated with the Clyde Estuary. This includes the Devol, Dougiehill and Boglestone areas of Port Glasgow.

Impact from 2 to 5km

6.91 To the north, at this range, a large part of the landscape is taken up by the Clyde Estuary where there are a limited number of receptors with the exception of Port Glasgow and Greenock. The topography of the Clyde Estuary means that views of the turbines will be largely screened from the denser settlements on the southside (i.e. Port Glasgow and Greenock). From the south the views across the landscape are over topography which rises and falls around the Gryfe and Green Water Valleys as they widen to the south. The topography of the Green Water Valley also screens views, particularly in the vicinity of the Duchal Estate and a large stretch of the B788 to the west of Kilmacolm. Most of the settlements lie in the shelter of the valleys with screening effects and a high level of tree cover. Views from within Kilmacolm will largely

be screened from within the town by the built form, tree cover and topography, particularly at street level. Some views will remain from some properties where localised circumstances allow. The majority of residents within the 2-5km range will have no predicted views of the turbines. This is again largely due to the screening influence of the topography of the Clyde Estuary.

Impact from 5 to 15km

- 6.92 There are some notable residential receptors beyond 5km to the south east along the Gryfe Valley where the topography over this distance will mean that impacts are generally very low. To the north the town of Helensburgh and Dumbarton will have some views from their frontages to the water but the distance will again mitigate impacts ensuring they will be low.
- 6.93 Visual impact from the proposed turbines will be relative to the degree of visual impact which was deemed acceptable for the turbine to the west at High Mathernock as they will affect a similar area. Perhaps of more relevance would be the cumulative impact that could be caused by the addition of these two turbines.



Turbine Data

Position - NS 32615 72120
& NS 32895 71815

Elevation - 179m & 169m

Hub Height - 45m

Blade Diameter - 44m

Photographic Data

Position - NS 36273 68430

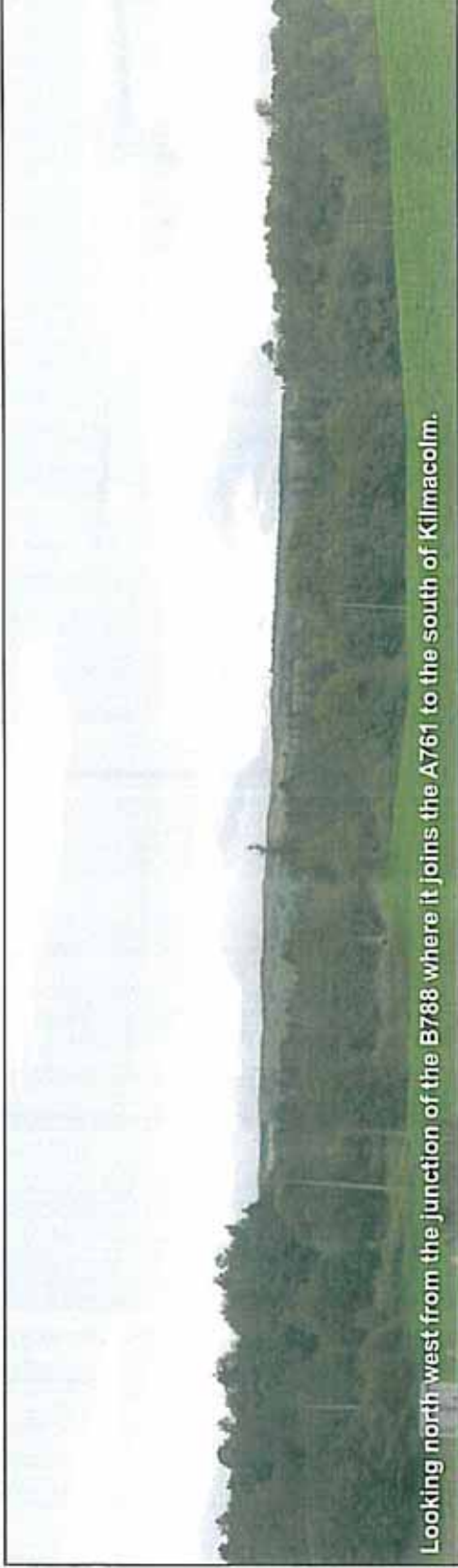
Elevation - 80m

Distance to nearest turbine - 4.78km

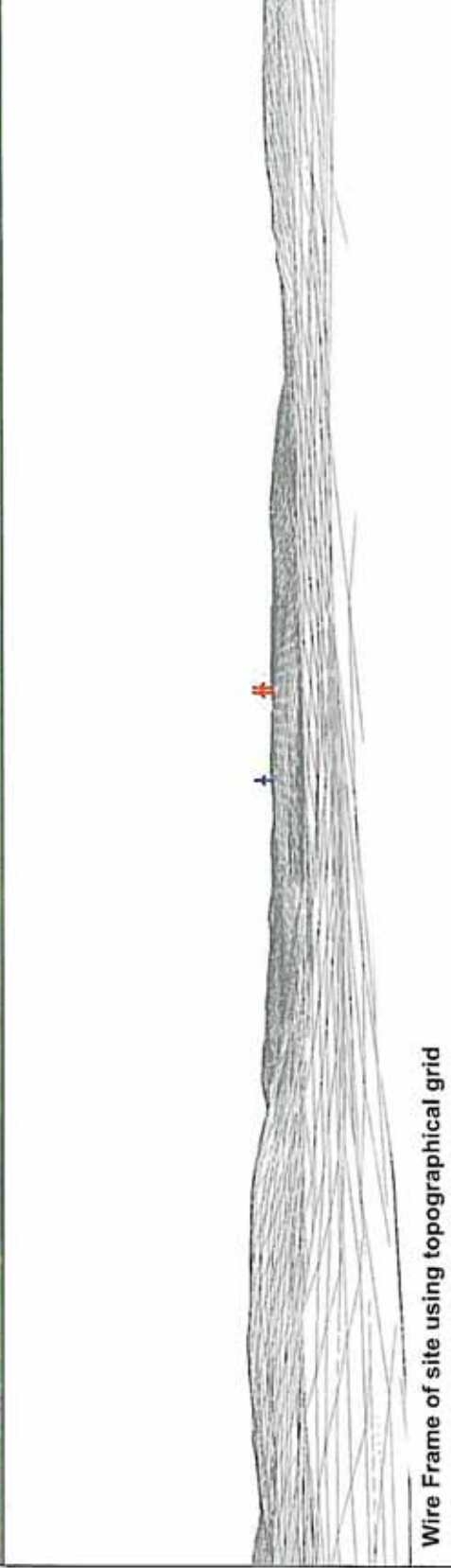
Viewer eye distance - 19.7cm @ A3
(39.4cm @ A1)

Camera - Canon EOS 1000D

Lens - 50mm Tamron lens



Looking north west from the junction of the B788 where it joins the A761 to the south of Kilmacolm.



Wire Frame of site using topographical grid



Photo Montage of Turbines in Landscape

PRIESTSIDE FARM
 P1 PHOTO MONTAGE
 December 2012
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A view north west from the junction where Auchenbothie Rd meets the A761 to the north of Kilmacolm.



Turbine Data

Position - NS 32615 72120
& NS 32895 71815

Elevation - 179m & 169m

Hub Height - 45m

Blade Diameter - 44m

Photographic Data

Position - NS 34744 70870785

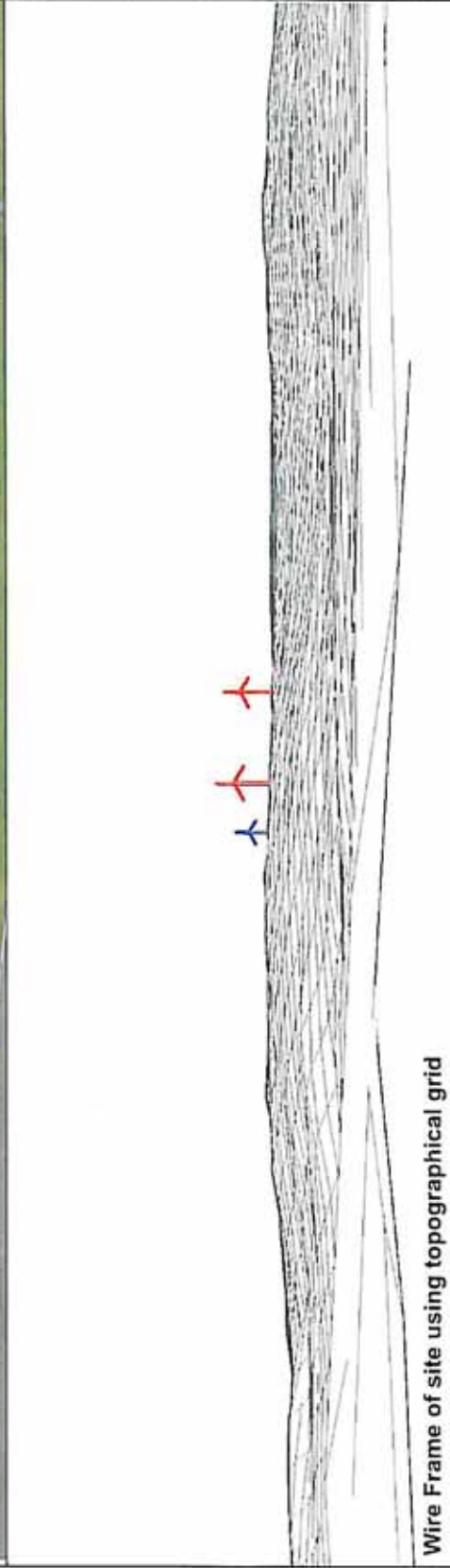
Elevation - 105m

Distance to nearest turbine - 2.11km

Viewer eye distance - 19.7cm @ A3
(39.4cm @ A1)

Camera - Canon EOS 1000D

Lens - 50mm Tamron lens



Wire Frame of site using topographical grid



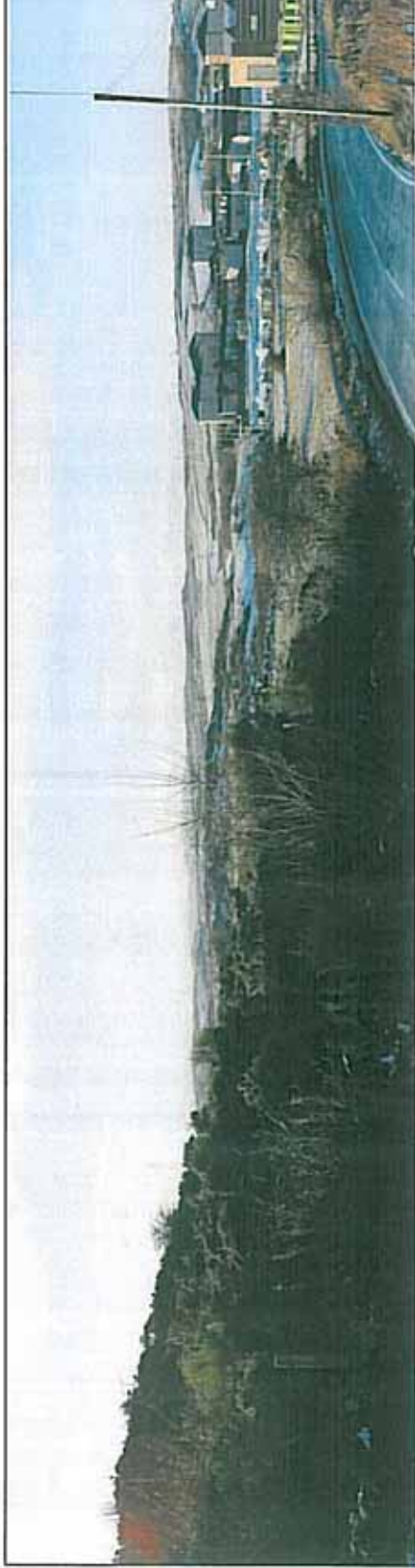
Photo Montage of Turbine in Landscape

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P2 PHOTO MONTAGE

December 2012

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LANDSCAPE ARCHITECTS**



View west from access road to Castlehill Farm on the A761. Flats at the edge of Port Glasgow can be seen on the right.



Turbine Data

Position - NS 32615 72120
& NS 32895 71815

Elevation - 179m & 169m

Hub Height - 45m

Blade Diameter - 44m

Photographic Data

Position - NS 34530 72633

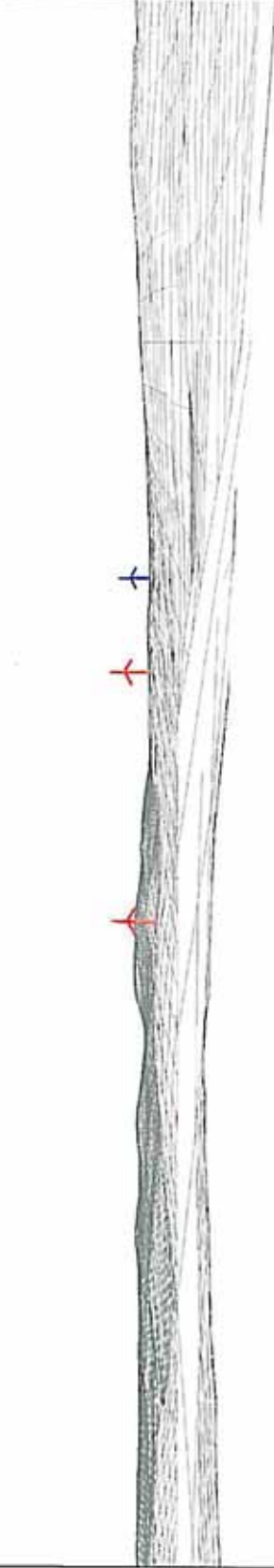
Elevation - 136m

Distance to nearest turbine - 1.82km

Viewer eye distance - 19.7cm @ A3
(39.4cm @ A1)

Camera - Canon EOS 1000D

Lens - 50mm Tamron lens



Wire Frame of site using topographical grid

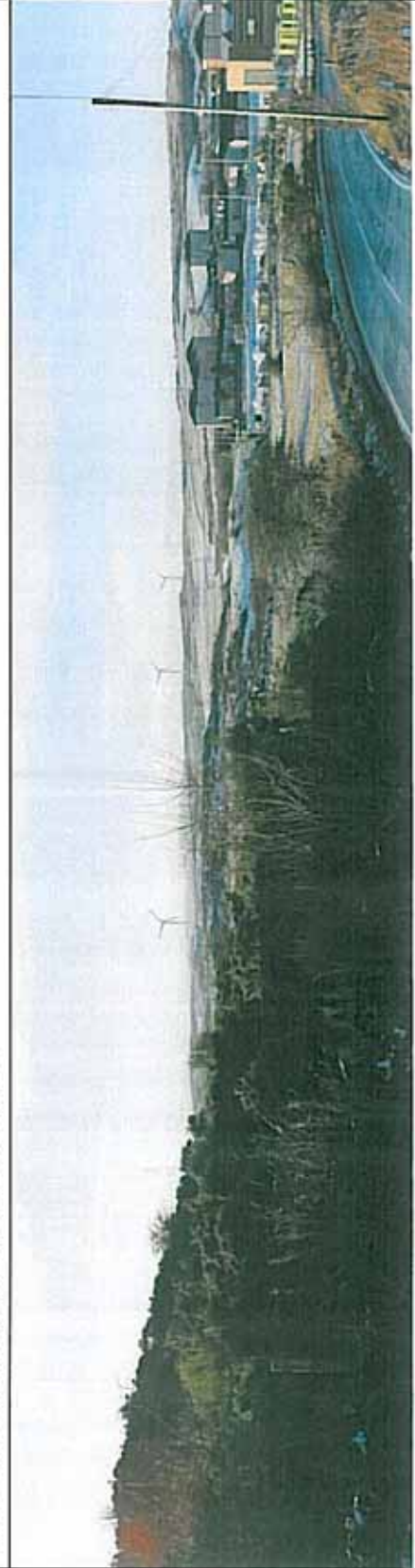
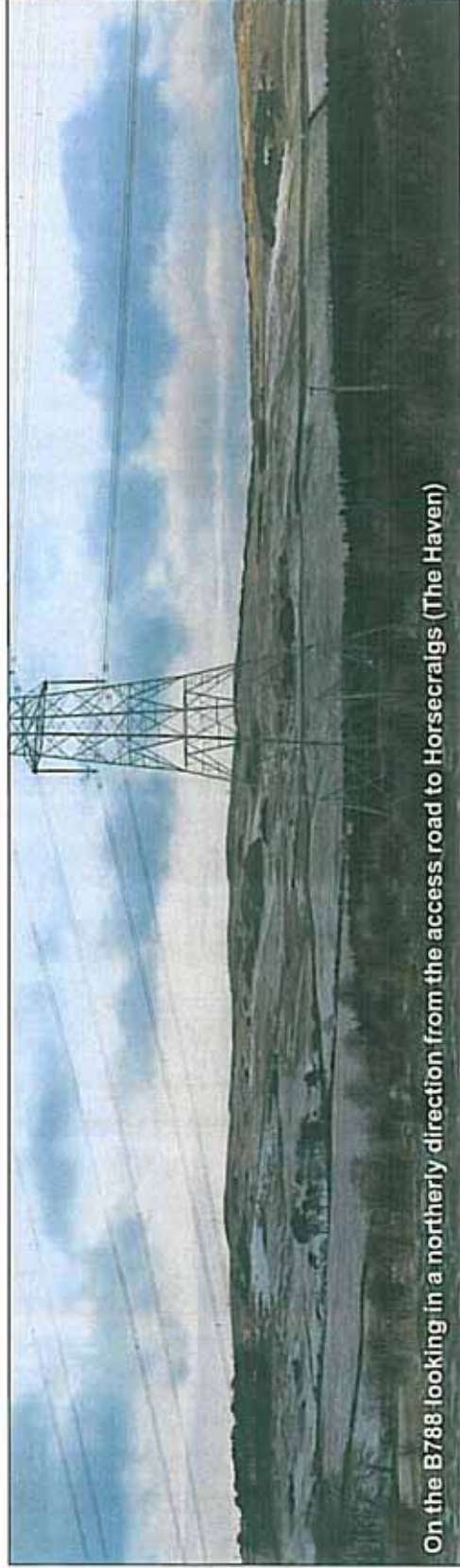


Photo Montage of Turbines in Landscape

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P3 PHOTO MONTAGE
December 2012
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On the B788 looking in a northerly direction from the access road to Horsecraigs (The Haven)



Turbine Data

Position - NS 32615 72120
& NS 32895 71815

Elevation - 179m & 169m

Hub Height - 45m

Blade Diameter - 44m

Photographic Data

Position - NS 31343 70622

Elevation - 158m

Distance to nearest turbine - 1.95km

Viewer eye distance - 19.7cm @ A3
(39.4cm @ A1)

Camera - Canon EOS 1000D

Lens - 50mm Tamron lens



Wire Frame of site using topographical grid

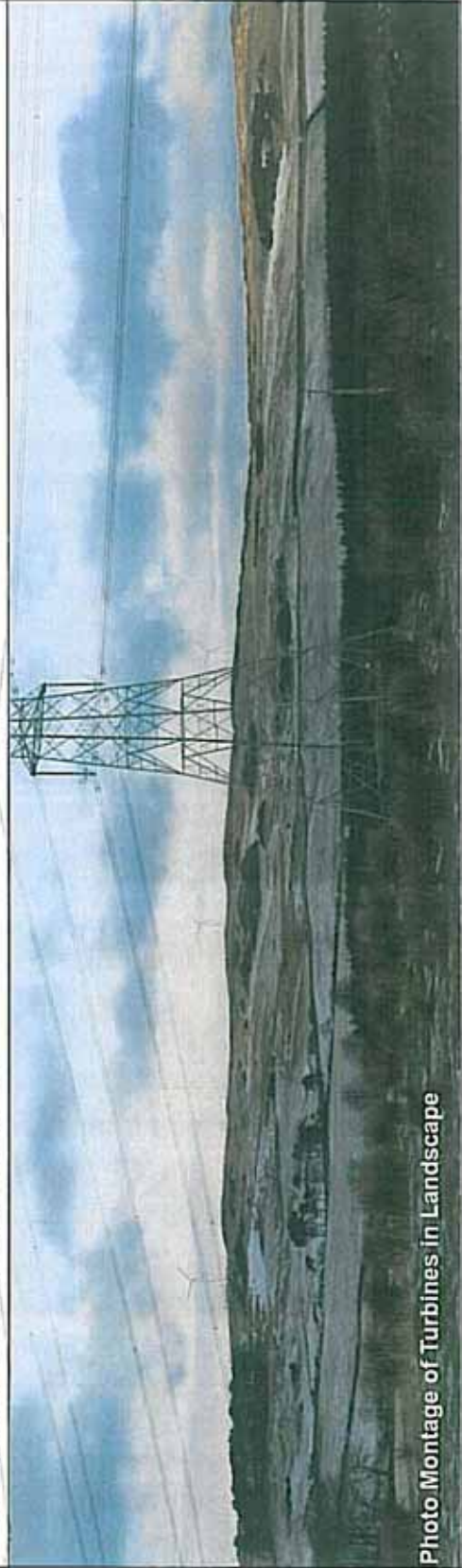


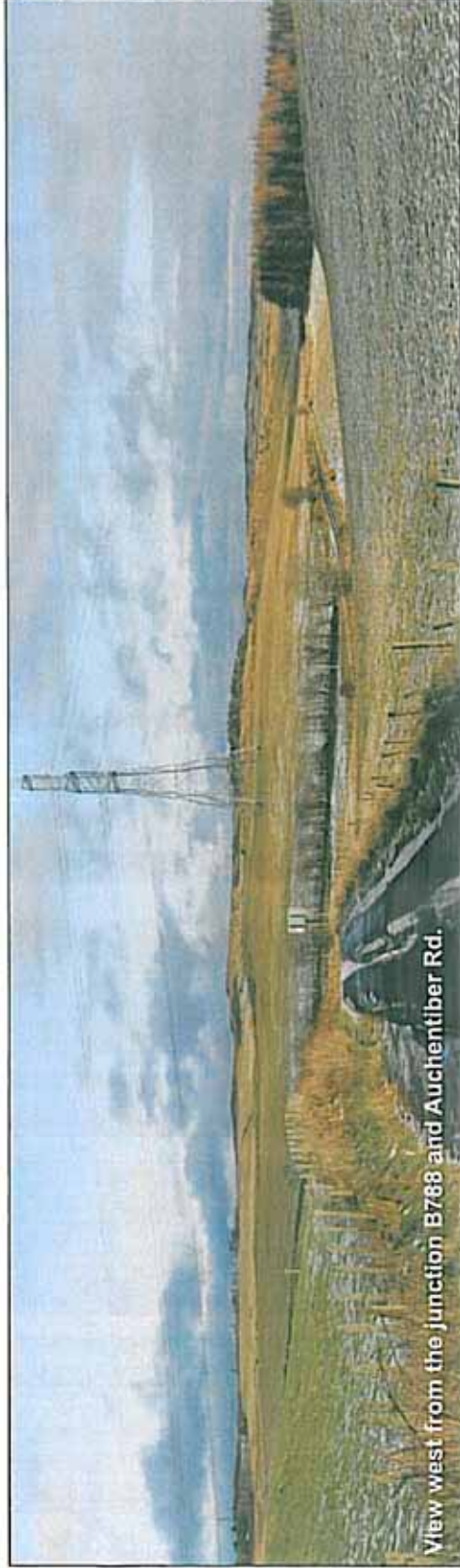
Photo Montage of Turbines in Landscape

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P4 PHOTO MONTAGE

December 2012

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View west from the junction B788 and Auchentiber Rd.



Turbine Data

Position - NS 32615 72120
& NS 32895 71815

Elevation - 179m & 169m

Hub Height - 45m

Blade Diameter - 44m

Photographic Data

Position - NS 30787 71792

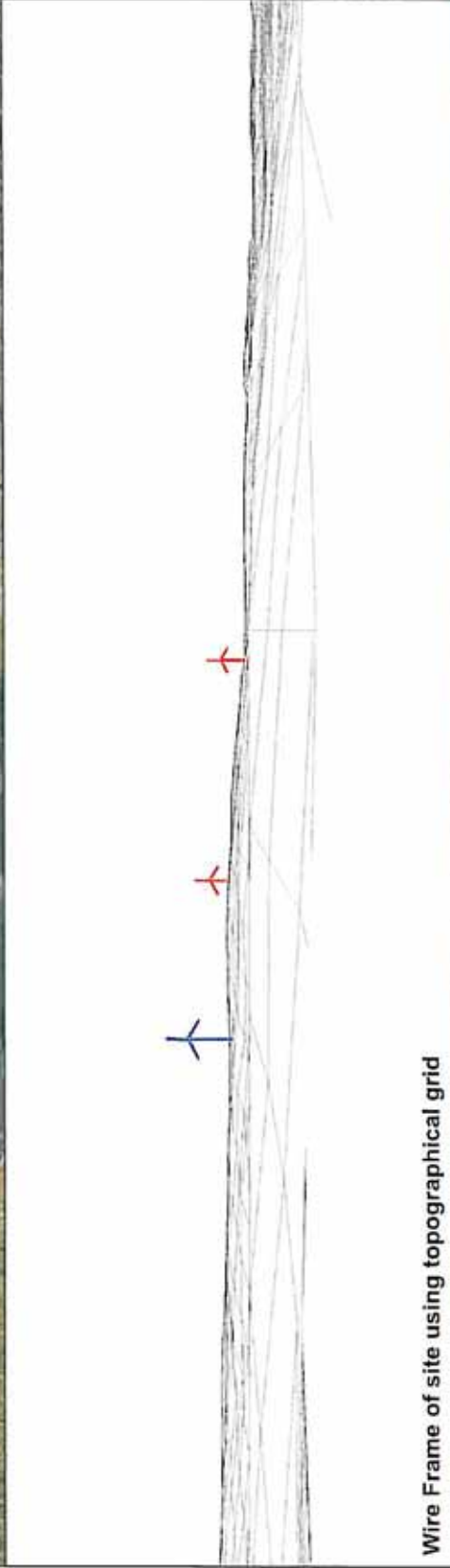
Elevation - 172m

Distance to nearest turbine - 1.85km

Viewer eye distance - 19.7cm @ A3
(39.4cm @ A1)

Camera - Canon EOS 1000D

Lens - 50mm Tamron lens



Wire Frame of site using topographical grid



Photo Montage of Turbines in Landscape

PRIESTSIDE FARM

P5 PHOTO MONTAGE

December 2012

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7. PHOTO MONTAGES

7.1 The following photo montages show the predicted visual impact from the turbines from settlements and key points within the landscape. The images show the two proposed turbines as red in the wireframe with the approved turbine on the adjacent land at High Mathernock included in blue. All three turbines have been shown in the photo montages in order to show a more accurate representation of the likely situation should they be implemented and to illustrate the cumulative relationship between them.

7.2 View Point One – Junction of B788 & A761

- **Location** - NS 36273 68430
- **Distance to nearest turbine** - 4.78km
- **Approximate elevation** - 80m
- **Receptor type** – Transport
- **Sensitivity** - Medium

Comment - The image has been taken from the junction of the B788 where it meets the A761 to the south of Kilmacolm. The turbines can be seen of the raised land on the far side of the Gryfe Valley. The level of tree cover in the valley can be seen on either side of the image and runs through the valley. The turbines can be seen on the raised land from this location as a window opens up in the views at this point.

7.3 View Point Two – Junction of Auchenbothie Road and the A761

- **Location** - NS 34744 70785
- **Distance to nearest turbine** - 2.1km
- **Approximate elevation** - 105m
- **Receptor type** – Transport
- **Sensitivity** - Medium

Comment - This image shows the view from the junction of Auchenbothie Road as it joins the A761 north of Kilmacolm. The turbines will be visible on the raised ground with the approved one on the left and the two proposed turbines on the right.

7.4 View Point Three – From the A761 south of Port Glasgow

- **Location** - NS 34530 72633
- **Distance to nearest turbine** - 1.82km
- **Approximate elevation** - 136m
- **Receptor type** - Transport
- **Sensitivity** - Medium

Comment - The image shows the turbines in the landscape from the A761 as it rises to the south of Port Glasgow. The turbines will be visible from this section of the road but will be screened to the south by the hill at Craigmartloch and by buildings and eventually topography to the north, into the town.

7.5 View Point Four – View from west on B788 at entrance to Horsecraigs

- **Location** - NS 31343 70622
- **Distance to nearest turbine** - 1.95km
- **Approximate elevation** - 158m
- **Receptor type** - Transport / Farm or Rural Homestead
- **Sensitivity** - Medium / High

Comment - The image shows the views from the B788 from across the Gryfe Valley. The turbines will be visible across the valley along the ridgeline at this close range. There are relatively few receptors within this section of the valley however.

7.6 View Point Five – View east from junction of Auchentiber Rd and B788

- **Location** - NS 30787 71792
- **Distance to nearest turbine** - 1.85km
- **Approximate elevation** - 172m
- **Receptor type** - Transport



Turbine Data

**Position - NS 32615 72120
& NS 32895 71815**

Elevation - 179m & 169m

Hub Height - 45m

Blade Diameter - 44m

Photographic Data

Position - NS 33081 70975

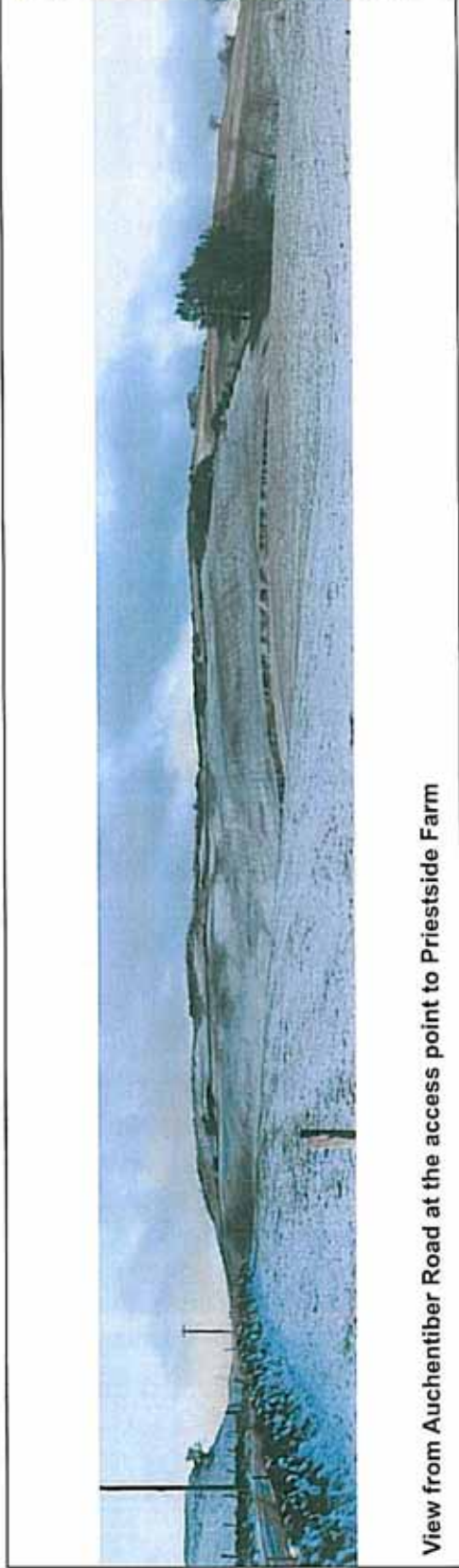
Elevation - 117m

Distance to nearest turbine - 860m

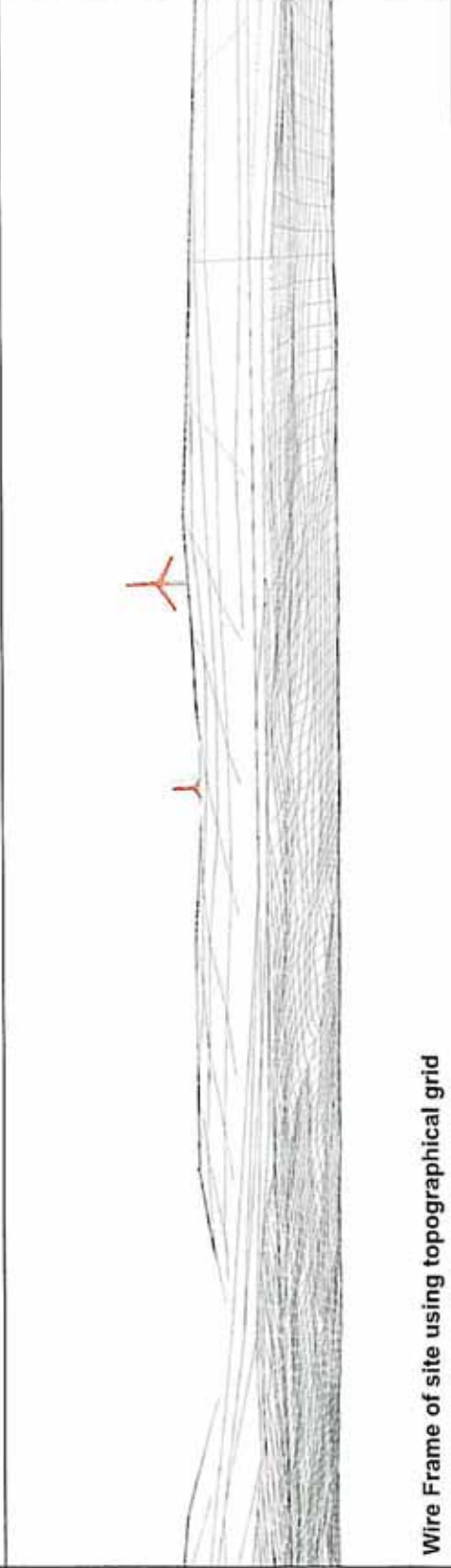
**Viewer eye distance - 19.7cm @ A3
(39.4cm @ A1)**

Camera - Canon EOS 1000D

Lens - 50mm Tamron lens



View from Auchtentiber Road at the access point to Priestside Farm



Wire Frame of site using topographical grid

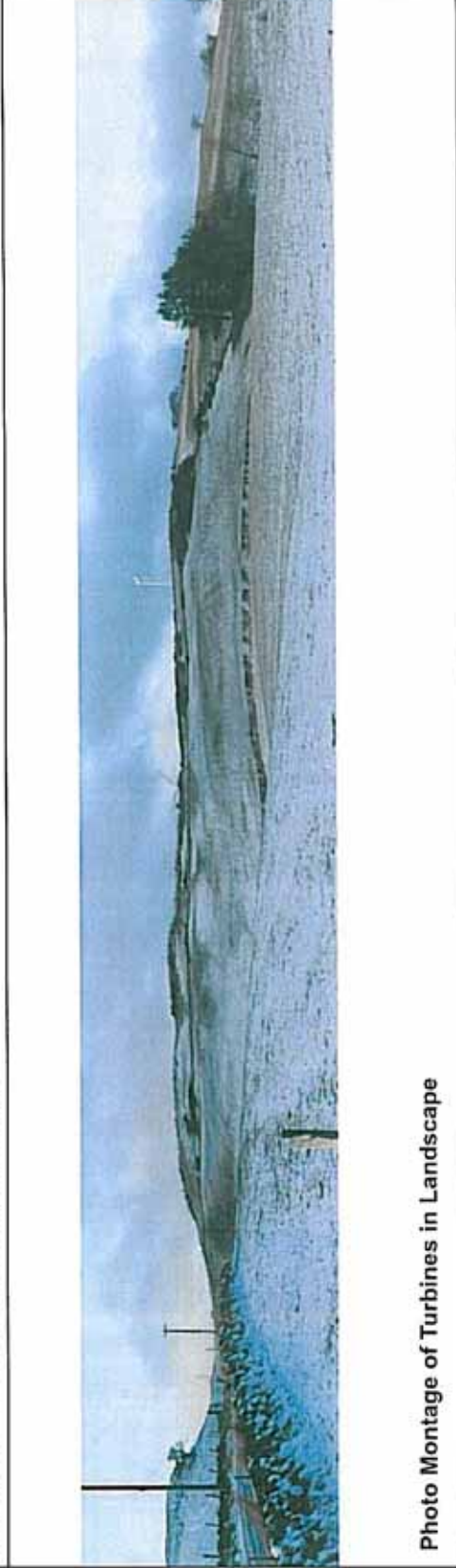


Photo Montage of Turbines in Landscape

PRIESTSIDE FARM
 P6 PHOTO MONTAGE
 December 2012
DAVID WILSON ASSOCIATES
LANDSCAPE ARCHITECTS



View from edge of Port Glasgow at Auchenbothie Road



Turbine Data

Position - NS 32615 72120
& NS 32895 71815

Elevation - 179m & 169m

Hub Height - 45m

Blade Diameter - 44m

Photographic Data

Position - NS 33786 72166

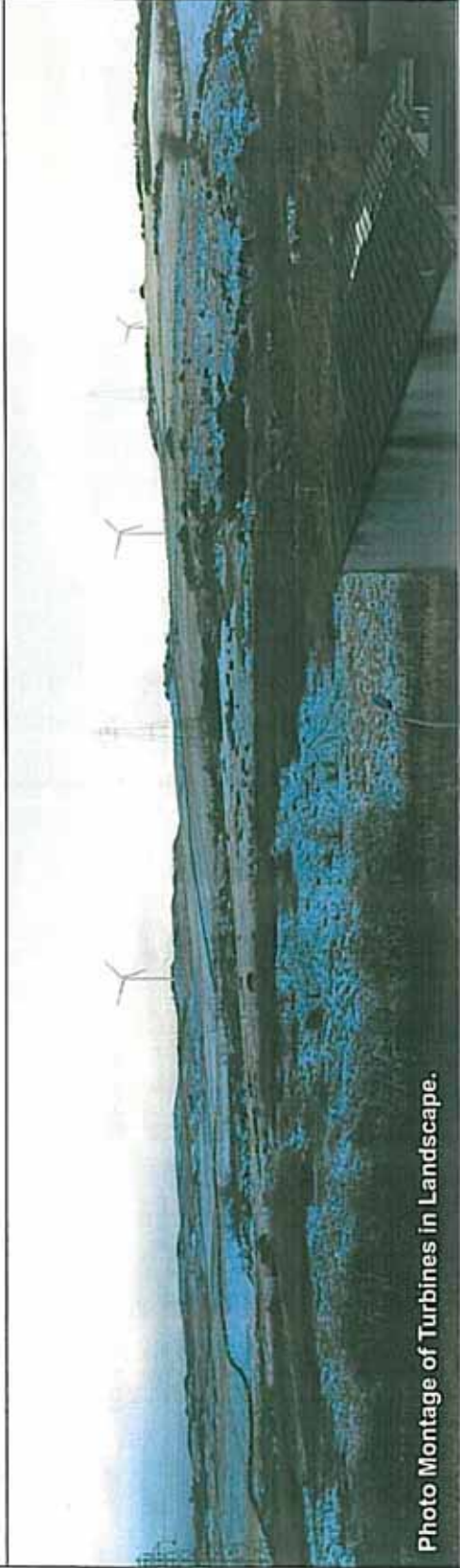
Elevation - 129m

Distance to nearest turbine - 1.19km

Viewer eye distance - 19.7cm @ A3
(39.4cm @ A1)

Camera - Canon EOS 1000D

Lens - 50mm Tamron lens



Wire Frame of site using topographical grid

Photo Montage of Turbines in Landscape.

PRIESTSIDE FARM

P7 PHOTO MONTAGE

December 2012

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- **Sensitivity** - Medium / Low

Comment - The view along Auchintiber Road from the west. Again the turbines will be visible from this close range.

7.7 View Point Six – View from Auchentiber Rd at the entrance to Priestside Farm.

- **Location** - NS 33081 70975
- **Distance to nearest turbine** - 860km
- **Approximate elevation** - 117m
- **Receptor type** - Transport / Farm or Rural Homestead
- **Sensitivity** - Low / Medium

Comment - The turbines will be partially screened by the topography from Auchentiber Road to the south of the raised land within the valley.

7.7 View Point Seven – South west of Slaemuir Ave in Port Glasgow

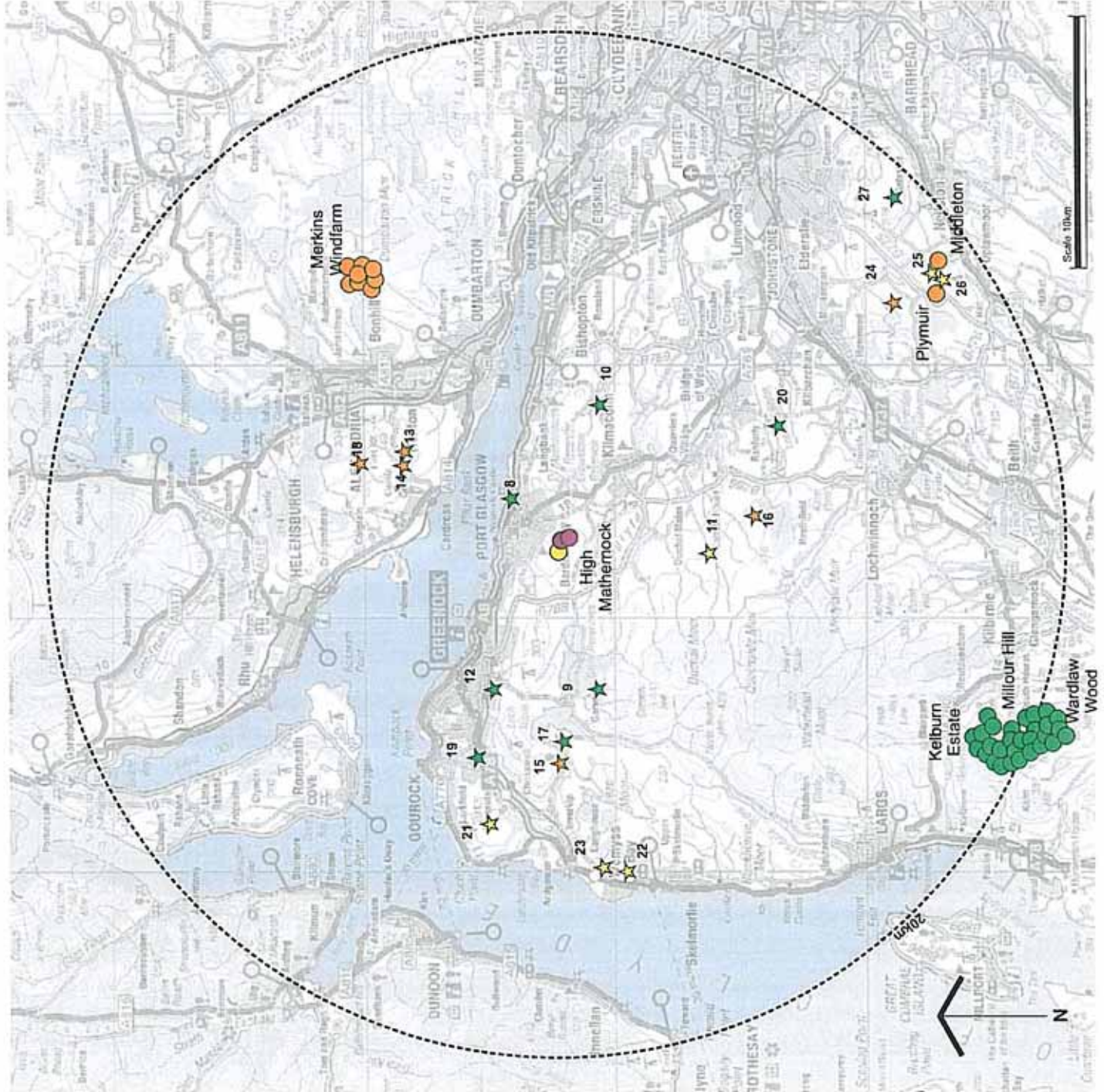
- **Location** - NS 33786 72611
- **Distance to nearest turbine** - 1.19km
- **Approximate elevation** - 129m
- **Receptor type** - Settlement
- **Sensitivity** - High

Comment - The image is taken from the edge of the properties on Slaemuir Ave which sit on a raised bank on the southern edge of the settlement. The turbines will be visible on the ridge to the south west.

- Developments with turbines over 50m
 - Operational Developments (Green circle)
 - Approved but not yet installed (Yellow circle)
 - Subject of Planning Application (Orange circle)

- Developments with turbines under 50m
 - Operational Developments (Green star)
 - Approved but not yet installed (Yellow star)
 - Subject of Planning Application (Orange star)
- Proposed Turbines at Priestside (Purple circle)

PRIESTSIDE FARM
 L5 CUMULATIVE IMPACT
 December 2012
DAVID WILSON ASSOCIATES
LANDSCAPE ARCHITECTS



8. Cumulative

8.1 Drawing L5 shows the wind farm activity in the region over a 20km radius and the potential cumulative impact created by them. This is based on SNH's Windfarm Activity in Scotland plan published in August 2012. This information is a few months out of date but appears to be the latest version of the map available from SNH. These have been checked against the Inverclyde Council eplanning web portal in an attempt to ensure that the information is up to date however this is a fast moving situation and over the period of time it is likely that some of the applications will have advanced and others may have been proposed. Others may have been withdrawn or refused. This information is accurate as of December 2012.

Operational developments greater than 50m to blade tip

	Distance (km)	No of turbines	Tip Height (m)
Built			
Kelburn Estate	18	19	102
Milbour Hill	19.6	6	125
Wardlaw Hill	20.1	6	125

8.2 All of the operational wind farms lie around 18-20km to the south of the study area, the closest being at 18km, and across the higher landscape. At this distance and over the topography it will be impossible to see these from the local vicinity of the site and there will be very few places where views would be possible of both the proposed turbine and any of the existing sites. If this were the case the locations would be remote and over such a distance as to make impacts negligible.

Consented developments greater than 50m to blade tip

	Distance (km)	No of turbines	Tip Height (m)
Approved			
High Matherdock	0.55	1	67

8.3 The High Matherdock development lies on the land to the west and will be the same turbine model and height as that proposed. The two proposed turbines would effectively be viewed as part of the same development within the landscape and viewed in conjunction with the proposed development as they are the same size and model. They will therefore appear as one development. These will have a greater cumulative impact than either development alone but the impact would be less than various developments throughout the area which are not uniform and are spread over a wider area. The High Matherdock development has been approved but has not yet been installed therefore there is no option for comparison within the existing landscape. It has therefore been included in the photo montages in order to allow a judgement to be made.

Subject of planning application greater than 50m to blade tip

	Distance (km)	No of turbines	Tip Height (m)
Planning			
Merkins	12.6	10	120
Plymuir	17.7	1	87
Middleton	18.5	1	61

8.4 All of the developments listed in the table above are over 10km away. The only one of these with a potential for cumulative impact with the proposals is at Merkins. This is located in the Kipparick Hills AGLV and close to the National Park and National Scenic Area. This will cause considerable visual impact if approved but cumulative impact would be not much greater in regard to the proposed turbines than that which would be caused by the already approved High Matherdock turbine over the distance of 12.6km. The other two proposed are single turbines at a considerable distance and should not cause any issues.

Small scale developments less than 50m to the blade tip

	Distance (km)	No of turbines	Tip Height (m)
Small Scale (below 50m)			
8 White House Products	2.8	1	25
9 Downies	5.4	1	27
10 Mid Glen	5.7	1	12
11 Lukeston	5.7	1	47
12 Muirdleston	6	2	22
13 Walkinton	7.1	1	46
14 Walton	7.2	1	35
15 Cornalees	7.4	1	34
16 Ladymuir Farm	7.6	1	46
17 Shelhill Farm	8.2	1	35
18 Acker	8.5	2	34
19 Inverchilde Academy	8.6	1	45
20 Lawmarnock	9.8	1	12
21 Leitchland	11	1	41
22 Finnoch Bog	12.4	2	47
23 Kelly Mains	12.8	1	34
24 Hartfield	16.2	1	46
25 Plymuir	18.2	1	27
26 South Plymuir	18.3	1	20
27 Capellie	19.1	3	19

8.5 There are five small scale developments identified within 6km of the proposed turbine, all but one having been installed. These are small scale and unlikely to cause cumulative impacts as they are not visible within the landscape around the proposed site

at present. Closest is the existing turbine site at Kelburn Business Park (White House Products) close to the waterfront. This lower lying turbine has a very low profile and cannot be seen from far beyond its location. It will not contribute to cumulative impact in conjunction with the proposed. The other turbines are small scale and far enough removed to mean that any cumulative contribution will be very low.

Conclusion

8.6 What can be seen from the drawing is that within the 10km radius of the site there are no active and few proposed wind farm developments. The only development which has significant potential to increase cumulative impact is the approved High Mathernock development on the adjacent land to the west. The combination of this and the proposed turbines would elevate the level of cumulative impact within the area but their uniformity and close proximity will reduce the effect of greater numbers of disparate developments and create the impression of a single larger development. This would be a preferable option for further wind turbine development in this area as it would maintain the impression of a single uniform development rather than wide spread and mismatching developments in future.

9. Overall Conclusions

Location and Context Conclusions

9.1 The designation of the site as a S.I.N.C. should not be affected in the long term as the reason for its status is based on the extensive groundcover vegetation across a wide area. This did not prevent the consent of the High Matherock turbine to the west. As the turbines will have a relatively small footprint and the operational part (i.e. the blades) will be suspended above this ground cover. There will be a requirement for additional access to be taken through some of the vegetation but this will form a narrow track 4m wide and will be relatively small in relation to the overall area. Overall, the protected vegetation should not be unduly impacted across the wider SINC area. This matter will have to be explored further by Inverclyde Council as the designation has been made by them.

9.2 There are no other physical constraints to the installation of the turbines at the proposed site. Any other potential impacts would be visual and these will be assessed in the relevant section of this document.

Landscape Setting Conclusions

9.3 The proposed turbines are in a relatively remote location and are unlikely to create physical impacts to other elements within the landscape or the area's inhabitants. The consent of the High Matherock turbine would also endorse this view as many of the issues which would potentially have affected this turbine would have remain the case for the proposed ones. The issues which have been raised through the legislation and guidance outlined in this chapter will, for the most part, not result in any constraints. Other potential impacts which would result from its installation may come from the visual or cumulative impact. This will be dealt with in the specific sections on these kinds of impacts.

Visual Impacts Conclusions

Receptor Conclusions

9.4 **Farms, dwellings and Small Hamlets** - There are a number of scattered farms and dwelling within 2km of the proposed site around the Gryte Valley. Many of these are working farms with a limited sensitivity however and relatively few of these are within 1km of the turbines. Most sit in sheltered areas with tree cover around them or within the landscape between them and the turbines, which give a degree of screening. There will be some impact however on some of the receptors.

9.5 **Towns and Villages** - The majority of settlements within the ZTV will have very limited views of the turbines which will be mitigated by the distances between them and the subject. The two closest settlements are Port Glasgow and Kilmacolm and these are the settlements with the greatest potential for visual impact. The topography and density of development within these settlements, along with tree cover in the case of Kilmacolm, will generally mean that any visual impacts upon them will fall upon the edges of the settlements closest to the turbines. It should be noted that within this highly populated area with several towns and large villages many will have no views of the turbines at all. Langbank, Balloch, Alexandria, Renton, Houston, Gourrock, Greenock, Bishopton, Kilbarchan, Inverkip, Brookfield, Killoreggan, Lochwinnoch, Howwood, Skelmorlie and Wemyss Bay all lie within the 15km study area but will have no views of the proposed development.

9.6 **Transport Routes** - There will only be any notable visual impacts upon transport receptors from the roads within 5km. These will be scattered and often mitigated by the topography, the meandering courses through the valley landscape and a high level of vegetation by roadsides in the form of woodland, tree cover or hedgerows. Views within 2km will be clearer but there are fewer significant receptors at this range. It should be noted that two of the main receptors in this category - the A8 and main railway line will not be affected as they run in the coastal land on the southern bank of the Clyde Estuary where the topography screens lines of sight.

9.7 **Cultural Heritage** - The long term settlement of the area around the Clyde Estuary means that there is a rich history within the landscape of the study area. This takes various forms (in varying conditions) and there are many examples of Gardens and Designed Landscapes. Of those affected by the ZTV many have only partial visibility and most are on the out ranges from the turbines. There are two within 5km of the site but these will have very limited visibility of the turbines due to primarily the topography and secondarily the high level of tree cover which tends to characterise such landscapes.

9.8 **Nature Conservation and Recreation** - The varied landscape of the study area has both settlements on the low sheltered land and conservation designations on the more remote and higher ground to the north and south west. The site has limited visual impact upon these designated landscapes and indeed occupies one of the few elevated areas within the wider landscape which will have such a limited impact upon these landscape designations.

Impact from 0 to 2km

9.9 Visual impact over the 2km range will be restricted to scattered farmsteads, a few rural homesteads, some minor roads and the southern edge of Port Glasgow. There will inevitably be some visual impact caused by the proposals at this close proximity. The turbines will be most visible within the Gryfe Valley immediately to the south and will reduce in visibility outwith this feature as the topography screens more of the towers. A large percentage of the residents within this 2km range will have no views of the turbines due to the screening topography associated with the Clyde Estuary. This includes the Devol, Dougfehill and Boglestone areas of Port Glasgow.

Impact from 2 to 5km

9.10 To the north, at this range, a large part of the landscape is taken up by the Clyde Estuary where there are a limited number of receptors with the exception of Port Glasgow and Greenock. The topography of the Clyde Estuary means that views of the turbines will be largely screened from the denser settlements on the southside (i.e. Port Glasgow and Greenock). From the south the views across the landscape are over topography which rises and falls around the Gryfe and Green Water Valleys as they widen to the south. The topography of the Green Water Valley also screens views, particularly in the vicinity of the Duchal Estate and a large stretch of the B788 to the west of Kilmacolm. Most of the settlements lie in the shelter of the valleys with screening effects and a high level of tree cover. Views from within Kilmacolm will largely be screened from within the town by the built form, tree cover and topography, particularly at street level. Some views will remain from some properties where localised circumstances allow. The majority of residents within the 2-5km range will have no predicted views of the turbines. This is again largely due to the screening influence of the topography of the Clyde Estuary.

Impact from 5 to 15km

9.11 There are some notable residential receptors beyond 5km to the south east along the Gryfe Valley where the topography over this distance will mean that impacts are generally very low. To the north the town of Helensburgh and Dumbarton will have some views from their frontages to the water but the distance will again mitigate impacts ensuring they will be low.

9.12 Visual impact from the proposed turbines will be relative to the degree of visual impact which was deemed acceptable for the turbine to the west at High Mathermook as they will affect a similar area. Perhaps of more relevance would be the cumulative impact that could be caused by the addition of these two turbines.

Cumulative Impacts Conclusions

9.13 What can be seen from the drawing is that within the 10km radius of the site there are no active and few proposed wind farm developments. The only development which has significant potential to increase cumulative impact is the approved High Mathermook development on the adjacent land to the west. The combination of this and the proposed turbines would elevate the level of cumulative impact within the area but their uniformity and close proximity will reduce the effect of greater numbers of disparate developments and create the impression of a single larger development. This would be a preferable option for further wind turbine development in this area as it would maintain the impression of a single uniform development rather than wide spread and mismatching developments in future.

DAVID WILSON ASSOCIATES
landscape architects

Area House 121 Calverly Street Hamilton ML3 8JA
www.davidwilsonassociates.co.uk
T e l : 0 1 6 9 8 2 0 0 3 5
e m a i l : design@dwalandscape.co.uk

PRODUCTION 3

Reporter's Decision Letter

Appeal Decision Notice

T: 01324 696 400
F: 01324 696 444
E: dpea@scotland.gsi.gov.uk



Decision by Trevor A Croft, a Reporter appointed by the Scottish Ministers

- Planning appeal reference: PPA-280-2011
- Site address: High Mathernock Farm, Auchentiber Road, Kilmacolm, PA13 4SP
- Appeal by David Connell against the decision by Inverclyde Council
- Application for planning permission 10/0340/IC dated 12 October 2010 refused by notice dated 8 September 2011
- The development proposed: erection of wind turbine
- Application drawings: 00041000, 001, 002, 003, 004, 005, Landscape statement
- Date of site visit by Reporter: 18 January 2012

Date of appeal decision: 20 February 2012

Decision

I allow the appeal and grant planning permission subject to the three conditions listed at the end of this decision notice. Attention is also drawn to the three advisory notes at the end of the notice.

Reasoning

1. The determining issues in this appeal are the impact of the proposed wind turbine on the landscape, residential properties and nearby settlements, taking into account the provisions of the development plan, and whether other material considerations support either allowing or dismissing the appeal.
2. The appeal proposal is for a 0.33 megawatt wind turbine and associated infrastructure located some three kilometres north-west of Kilmacolm. It would be 45 metres in height to the hub, and 61 metres to the upper blade tip. The site forms part of High Mathernock farm, approximately 1.2 kilometres east of the B788 Greenock-Kilmacolm road. Access would be via farm track, known as the Devol Road, which leads north from Auchentiber Road towards Port Glasgow. The site, identified for me by a fence post, is on ground rising to the north at an altitude of about 185 metres, comprising of marginal rough grazing which was very wet at the time of my inspection. The surrounding landscape is rolling grassland with a number of farmsteads in the vicinity. The nearest ones are Auchentiber, Cunston, High Mathernock and Priestside, some 1,070, 1,360, 1,145 and 1,500 metres away respectively. The latter is subject to another, independent, appeal for



an anemometer mast that is associated with the proposed turbine. I have dealt with that appeal in a separate decision notice.

3. The single reason for refusal states that the combination of height and scale, proximity to public roads, a core footpath, residential properties and visual prominence from Kilmacolm (would) create a dominant and excessively prominent feature in this part of Inverclyde's countryside, contrary to local plan policy UT6, small wind turbine interim policy UT6B, and wind farms interim policy UT6A.
4. Local Plan policy UT6 Renewable Energy Infrastructure states, in brief, that in assessing such proposals regard will be had to the impact on five criteria, the relevant ones here being (a) natural environment, (b) landscape, particularly viewed from major transport corridors, and (c) residential amenity. Interim policy UT6A is for wind farms with a power output of 20 megawatts and above, so clearly does not apply in this case. Interim policy UT6B is for small scale wind turbine developments and says that these will be supported where the criteria of local plan policy UT6 are met, where relevant, and having regard to the impact on six criteria, the relevant ones being (a) neighbouring/adjoining properties and residential amenity generally, and (f) landscape, especially when viewed from public vantage points and set against the skyline.
5. The appellant's submissions include assessments that cover impact on birds, transport, construction, grid connection and electrical works, hydrology and drainage, and landscape and visual. The latter provides photomontages and wirescapes from six viewpoints: one to the south of Kilmacolm; two to the north of the settlement, and east of the site, on the A761 Kilmacolm to Port Glasgow road; and three on the B788 to the west of the site. Consultants commissioned by the council concluded that this report lacked sufficient detail and clarity of conclusions, so it was revised by the appellant (then applicant). The council's consultants, whilst maintaining some criticisms of the revised document, considered it provided the council with sufficient information to make a decision on the proposal, although they did not make a specific recommendation about this. I agree with this view, and find the overall information provided, taken with my own observations at the site and surrounding area, are sufficient for me to make a considered judgement about the impact of the proposed turbine.
6. Taking first the 2005 local plan, the preamble to policy UT6 refers generally to windfarms, rather than smaller scale developments of a single or a small number of turbines, and there is no clear expression of the council's attitude to these. It is therefore left to a consideration of the criteria set down in the policy to determine specific proposals.
7. Of the relevant ones, looking at the natural environment, criterion (a), the appeal site is located within a site of interest to nature conservation, a local plan designation. The site covers a large area, predominantly to the east and north-east of the appeal site. The western boundary of the designated site at this point follows the Devol Road, which is only a few metres away from the appeal site. My own observations suggest that the site has little nature conservation value at this point. The council's biodiversity officer does not have any concerns about the proposal, mainly because of its small scale. Scottish Natural Heritage concluded that the proposal will not have a significant effect on the qualifying



interests of the Renfrewshire Heights, Inner Clyde or Black Cart Special Protection Areas, and in particular would not impact on internationally important populations of breeding hen harriers. I find there is no conflict with criterion (a).

8. Looking at criterion (b) the proposed turbine is of medium scale compared to the large turbines used for major windfarms, which can now exceed 130 metres in height. The generator nacelle is also modest in size. I have found from my own observations during site inspections elsewhere that it is of a type similar to those frequently used for small scale renewable energy developments, such as the one proposed.

9. The appellant has commented that the level of information suggested by the council's consultants is more relevant for a windfarm, rather than a single turbine, for which an environmental impact assessment is not normally required. I have some sympathy with this opinion. Every wind turbine of a non domestic scale is likely to appear significant in the landscape, but will be less so than a larger number of taller turbines. The question to be addressed is whether that impact is acceptable in any given set of circumstances.

10. The principal objection to the proposal is from Kilmacolm Community Council. It submitted a helpful and detailed commentary, although the policy guidance quoted has largely been replaced by Scottish Planning Policy. Although assessing a range of impacts the submission focuses on visual impact and proximity to settlements. It considers that the amount of energy produced would be so small a contribution towards the Government's targets that it would not justify the visual harm that would come from the proposal. It concludes that to supply energy for Inverclyde homes would require 200 such turbines, which would have a disastrous effect on the local landscape. Inverclyde should therefore have a clear policy of refusing wind turbines.

11. There are a number of flaws in these arguments. Such a policy would be contrary to Government guidance. The appeal proposal is for a single turbine – any future proposals would have to be assessed on their own merits, including the cumulative impact with existing turbines, which would place a limit on the number of turbines allowed. The amount of energy produced is not a reason for refusing the development, providing the impact is acceptable.

12. Other than from parts of the southern edge of Port Glasgow the proposal meets the two kilometre separation distance from settlements referred to in Scottish Planning Policy. However, because of the comparatively small scale of the proposed turbine, its impact when seen from that area, particularly from Bardrainey, would not so significant, within the overall scale of the landscape, as to justify refusal of the development. I reach the same conclusion with respect to Kilmacolm, and other settlements in the surrounding area. It would also be seen from a greater distance, including parts of Argyll to the north of the Clyde, but from these distances it would be virtually invisible in many climatic circumstances. If a greater number of turbines were proposed the conclusion may be different, but I must deal with the single turbine before me.

13. As well as taking into account the photomontages, I viewed the site from the main routes in the area during my inspection. I also noted the large number of pylons in the



area. Whilst these are much shorter in height, many are particularly prominent because of relatively complex construction. Whilst this does not provide an argument for further prominent features in the landscape, it does mean that the turbine would not be the only feature drawing the eye from viewpoints in the area. In this case, and based on my experience of similar turbines elsewhere, the impact from a distance would be subdued within the scale of the wider landscape. Taking all these considerations together, I find that the visual impact of the proposed turbine would not be so significant as to justify refusal. Therefore there is no overriding conflict with criterion (b).

14. Similar considerations affect criterion (c), residential amenity. There are objections from the occupiers of the three properties likely to be most affected by the turbine, Auchentiber, Cunston and High Mathernock, being the closest to the site, with relatively clear lines of sight. The latter would arguably be subject to greater impact because of the turbine being viewed from significantly lower ground. On balance, however, because of the scale of the turbine, and a viewing distance of over one kilometre, I do not accept the council's view that there would be an unacceptable impact on the residential amenity of these properties. Judgement against criterion (c) is therefore acceptable. Taking the three criteria together, I find the proposal compatible with the relevant policy of the local plan.

15. Looking at interim planning policy UT6B, the criteria for this cover similar subject areas to those of the local plan policy. The considerations set out above therefore apply, and I find no major conflict with the policy.

16. A number of other issues have been raised, including potential impact on water supply at High Mathernock Farm. It is stated that the proposal, especially as a result of construction excavation, could contaminate the water supply, which comes from the spring lower down the hill. There is no clear evidence to support this, but I note the council's Head of Safer and Inclusive Communities does not have any concerns, and the spring appears to be fed from a locally different part of the catchment. Similarly the council is not concerned about noise or shadow flicker. Because of the distances involved I accept this view. I also accept the council's view, again because of the distances involved, that road safety would not be an issue.

17. The council also expresses concern about the proximity of core paths to the turbine – the closest being the Devol Road, which is effectively adjacent to the site. I do not regard the proposed turbine as being of such a scale that it is likely to discourage many people walking past on a through route. There may even be some who would regard the turbine as being of visual interest. In reality, given the relative density of core paths across the country, the refusal of turbine development within close proximity would rule out large areas of countryside that would otherwise be suitable for the development, and I am certain this was not the intention of any relevant Government policy.

18. Finally, balancing the objectors' and council's views against the development, with the general Scottish planning and energy policy support for wind energy development, despite the relatively low output of this single turbine, I conclude that any adverse impacts would not be significant enough to justify refusal, and that the proposal accords with the broad spirit, if not the exact letter of the development plan.



19. The council suggest two conditions in the event of permission being granted, relating to decommissioning and turbine colour. It is also standard practice with such developments to place a 25 year life on the permission, and the council accepts this. Other conditions have been suggested but these are generally concerning matters covered by other legislation, such as water quality. SNH suggests limitations on periods of working during decommissioning, but this could be dealt with by the council at that time. I have modified the council's proposed conditions to bring them into line with standard wind turbine practice, whilst retaining their essential meaning. Subject to this the conditions meet the tests set out in circular 4/1998 regarding the use of conditions in planning permissions.

20. I have considered all the other issues raised, but found none that justifies a different decision.

Trevor A Craft

Reporter

Conditions

1. The permission hereby granted shall endure for a period of 25 years from the commencement of development. At the end of the 25 year period, unless with the express approval in writing of the planning authority, the wind turbine, structures and ancillary equipment shall be dismantled and removed from the site, and the ground fully reinstated to its former condition to a depth of no less than one metre below ground surface level or such other means of restoration shall be carried out as may be agreed in writing by the planning authority. *(Reason: in recognition of the expected lifespan of the wind farm and in the interests of safety and visual amenity once the plant is redundant.)*
2. In the event that the turbine fails to produce any electricity supplied to the grid for a continuous period of twelve months then it shall be deemed to have ceased to be required and, unless agreed in writing with the planning authority, the wind turbine and the ancillary equipment directly associated with that wind turbine shall be dismantled and removed from the site, and the ground fully reinstated to the written satisfaction of the planning authority, to the specification set out in condition 1. *(Reason: to avoid the adverse visual impact arising from a stationary or partly dismantled wind turbine.)*
3. The wind turbines shall be finished in a non-reflective semi-matt finish and should not display any advertising on any part of the turbine unless otherwise agreed in writing with the planning authority. Confirmation of the details of the finish and colour of all externally visible components shall be submitted to and agreed in writing by the planning authority prior to the commencement of development. *(Reason: in the interests of visual amenity and landscape protection.)*



Advisory notes

1. **The length of the permission:** This planning permission will last only for three years from the date of this decision notice, unless the development has been started within that period. (See section 58(1) of the Town and Country Planning (Scotland) Act 1997 (as amended).)
2. **Notice of the start of development:** The person carrying out the development must give advance notice in writing to the planning authority of the date when it is intended to start. Failure to do so is a breach of planning control. It could result in the planning authority taking enforcement action. (See sections 27A and 123(1) of the Town and Country Planning (Scotland) Act 1997 (as amended).)
3. **Notice of the completion of the development:** As soon as possible after it is finished, the person who completed the development must write to the planning authority to confirm the position. (See section 27B of the Town and Country Planning (Scotland) Act 1997 (as amended).



**SUGGESTED CONDITIONS SHOULD
PLANNING PERMISSION BE GRANTED ON
REVIEW**

**ERECTION TWO 67m HIGH (TO BLADE TIP) WIND TURBINES:
PRIESTSIDE FARM, AUCHENTIBER ROAD, KILMACOLM (13/0036/IC)**

Suggested conditions should planning permission be granted on review

Conditions

1. The permission hereby granted shall endure for a period of 25 years from the commencement of the development. At the end of that period, unless a further application for its retention has been submitted to and approved by the Planning Authority, the wind turbines, structures and ancillary equipment shall be dismantled and removed from the site, and the ground fully reinstated to its former condition to a depth of no less than one metre below surface level, or such other means of restoration shall be carried out as may be agreed in writing by the Planning Authority; all such restoration to be completed within six months of the end of the 25 year period.
2. In the event that the turbines fail to produce any electricity supplied to the grid for a continuous period of twelve months then they shall be deemed to have ceased to be required and, unless agreed in writing by the Planning Authority, the wind turbines, structures and ancillary equipment shall be dismantled and removed from the site, and the ground fully reinstated to its former condition in accordance with the requirements of condition 1.
3. The wind turbines shall be finished in a non-reflective, semi-matt finish and no advertising shall be displayed on any part of the turbines unless otherwise agreed in writing by the Planning Authority. Details of the finish and colour of all externally visible components shall be submitted to and approved in writing by the Planning Authority prior to the commencement of development.
4. That prior to the start of development, details of a survey for the presence of Japanese Knotweed shall be submitted to and approved in writing by the Planning Authority and that, for the avoidance of doubt, this shall contain a methodology and treatment statement where any is found. Development shall not proceed until treatment is completed as per the methodology and treatment statement. Any variation to the treatment methodologies will require subsequent approval by the Planning Authority prior to development starting on site.
5. That the presence of any previously unrecorded contamination or variation to anticipated ground conditions that becomes evident during site works shall be brought to the attention of the Planning Authority within one week. Consequential remediation shall not be implemented unless it has been submitted to and approved, in writing by the Planning Authority.

6. That no fill or landscaping material shall be imported onto the site until written details of the source and intended reuse of the imported materials has been submitted for approval, in writing by the Planning Authority. The report shall characterise the chemical quality (including soil-leachate and organic content etc), volume and source of the imported materials with corresponding cross-sections and plans indicating spatial distribution and depth/thickness of material placement within the development site. The material from the source agreed only shall be imported in strict accordance with these agreed details.

7. The level of noise emissions from the wind turbines when measured at any dwelling, lawfully existing at the date of permission, shall not exceed:

- a. between the hours of 23:00 and 07:00 the greater of 43dB L_A90 (10 min) or 5dB(A) above the Night Hours Background Noise level at that property; or
- b. between the hours of 07:00 and 23:00 the greater of 40dB L_A90 (10 min) or 5 dB(A) above the quiet Waking Hours Day Time Background Noise Level at that property.

8. No development shall commence until the size and weight of vehicles required to transport components and carry out maintenance, their route, locations of infrastructure required to be changed to accommodate the vehicles, number of proposed delivery trips, date of trips and details of likely remediation works to roads and verges have been submitted to and approved in writing by the Planning Authority.

9. No development shall commence until drainage details, a drainage impact assessment and confirmation that SEPA's permission has been granted to cross any stream or river have been submitted to and approved in writing by the Planning Authority.

Reasons

1. In recognition of the expected lifespan of the wind turbine and to ensure the proper restoration of the site, in the interests of safety and visual amenity, at the end of the permitted period.

2. In the interests of the visual amenity of the area by removing redundant or partially dismantled equipment.

3. In the interests of the visual amenity of the area.

4. To help arrest the spread of Japanese Knotweed in the interests of environmental protection.

5. To ensure that all contamination issues are recorded and dealt with appropriately.

6. To protect receptors from the harmful effects of imported contamination.

7. To protect the amenities of occupiers of premises from unreasonable noise and vibration levels.

8. In the interests of road safety on Inverclyde's road network,

9. To prevent harm from flooding.