



## **Supporting Statement**

### **Review of Application 12/01265/PP**

**Reference** 12/01265/PP

**Proposal** Erection of 20m high 20kw wind turbine (27m to blade tip)

**Address** Land north-east of Ardyne Farm, Toward, Argyll

The following statement supports the request for the review of application 12/01265/PP for the installation a 20kw wind turbine, 27m to blade tip, which was refused consent on 21<sup>st</sup> September, 2012.

The proposed wind turbine development was refused due to concerns about the potential visual impact on a neighbouring residential development Strathclyde Cottage, the Chinese Lakes of the Castle Toward Garden and Designed Landscape, and the Area of Panoramic Quality associated with the western part of Toward Point.

This statement will demonstrate that the wind turbine at Ardyne Farm is appropriately sited, supports National and Local Policy guidelines and will not have a detrimental visual impact on the surrounding landscape. We will also show that the impact on the receptor Strathclyde Cottage is not unacceptable and should not form grounds for refusal.

### Renewable Energy Policy

The European Union's current Renewable Energy Directive on the promotion of the use of energy from renewable sources sets ambitious targets for all Member States, such that the EU will reach a 20% share of energy from renewable sources by 2020. For the UK, the Directive sets a target of 15% of energy from renewables by 2020.

The Scottish government is committed to increasing the amount of electricity generated from renewable sources. The current target is to meet the equivalent of 100% of Scotland's electricity requirement from renewable sources by 2020. The government is keen to encourage communities and small businesses to invest in renewable energy projects. Scottish Planning Policy, published in February 2010, seeks to support these initiatives.

Argyll and Bute Council Local Plan (2009) recognises that onshore wind power is likely to make the most substantial contribution towards meeting the targets for electricity generated from renewable sources set by Government and supports the wider application of medium and smaller scale renewable technologies.

Furthermore, as an agricultural business, Ardyne Farm is under added pressure to pursue green energy solutions as a result of increasing power costs and new policy requirements issued by the EU to encourage green farming practices.

### Proposal 12/01265/PP

Proposal 12/01265/PP applied for consent to erect one wind turbine, measuring 27.13m to blade tip, a 'small typology' wind turbine as classified by the Argyll and Bute Landscape Wind Energy Capacity Study (2012). The development site is on grazing land approximately 250m northeast of the farm buildings at Ardyne. The land is situated approximately 1930m to the northwest of the A 815, and 330m east of the nearest public road. The wind turbine is to be located on the slope of the grounds extending northeast from the Ardyne farm complex, and is positioned in order to optimise access to wind resource. The position also complies with the Argyll and Bute Landscape Wind Energy Capacity Study which suggests that small typology wind turbines should be sited on higher hill slopes, set back slightly from farm buildings and other settlement to avoid overwhelming their scale. The development will generate green electricity for consumption at Ardyne Farm, and contribute to the Scottish Government target

for renewable sources to generate the equivalent of 100% of Scotland's gross annual electricity consumption by 2020.

### Site Location

The wind turbine development site is situated on the edge of the land characterised as 'Rolling Farmland with Estates' (Character Type 13) by the Argyll and Bute Landscape Wind Energy Capacity Study, close to the 'Steep Ridgeland and Mountains' (Character Type 1) area. Character Type 13 is classified as of Medium Sensitivity for the small typology wind turbines, which are thought to be a better fit with the scale of the landform and settlement. The Landscape Capacity Study also suggests that there is an opportunity for smaller typology wind turbines to be situated in Character Type 1 areas 'Steep Ridgeland and Mountains' which are characterised by gentler hill slopes with a less distinct field enclosure pattern. Thus, based on the guidance put forward by the Argyll and Bute Wind Energy Landscape Capacity Study, the chosen development site is clearly appropriate for the scale of wind energy installation proposed by 12/01265/PP.

### Landscape and Visual Impact

Extensive visualisations have been compiled and submitted in support of the Ardyne Farm proposal, including photomontage images for viewpoints selected by the appointed case officer. This information demonstrates that the 20kw wind turbine proposed for installation at Ardyne farm would have a low level of impact on the surrounding landscape. However, the potential adverse visual impact of the installation forms the basis of the refusal of planning consent for the proposal. We feel that this concern is unfounded, as will be explained below.

Furthermore, we are concerned that the negative assessment of the machine's potential visual impact is expounded by a misunderstanding of the size and scale of the wind turbine which, again, is of the 'small scale' typology as defined by Argyll and Bute's own supplementary planning guidance. Our concerns are supported by the judgement of the application against policy LP REN 1 which is concerned with Wind Farms and large wind turbine installations. By measuring the proposal 12/01265/PP against LP REN 1 an unfair prejudice is introduced for any assessment of the application, as the corresponding presumption is that the development is much larger than that which is actually proposed. The 20kw wind turbine is an on-site domestic wind turbine, and the energy generated by the wind turbine is intended for use at Ardyne Farm. The machine is positioned as close as is technically and safely possible to the Ardyne Farm complex. Due to the steep sloping nature of the field in which the turbine is located, and the potential turbulence that would be created by the Ardyne Farm buildings and mature tree growth in that area, the wind turbine could not be sited any closer to the farm. Finally, due to high levels of energy demand at the Ardyne Farm complex, it is not anticipated that there will be excess energy to be sold back to the national grid. Consideration of these factors clearly demonstrates that the application 12/01265/PP should have been judged under LP REN 2 On-site Commercial and Domestic Wind Turbines. Supporting visualisations show a low level of impact as is to be expected of a domestic scale wind turbine.

The photomontage images presented for the initial viewpoints reveal that the turbine would be well screened and unlikely to be visible from public roads in the area. Visualisations provided for the viewpoints selected by case officer Brian Close further demonstrate the limited visual

impact that the Ardyne Farm wind turbine would have on public roads in the area. The photomontage image for viewpoint H shows the turbine as seen from the public road to the northwest of the installation site. Unlike most roadsides in the area, from this position the wind turbine will be visible and is not screened by tree cover. Although visible, the machine will have a low level of visual impact on the landscape when viewed from this direction. Mature tree growth in the foreground exceeds the height of the turbine so that it does not stand as a lone vertical structure, nor does it dominate the landscape. Also, future regrowth of recently felled conifers will provide further context for the wind turbine when viewed from this angle and act as a potential backdrop, reducing the visual impact. Thus, it can be concluded that the wind turbine will not have a significant impact on the local landscape when considered from public roads in the area.

Neither will the wind turbine have a negative visual impact on scenic views from the Isle of Bute across to Toward Point. Wireframe drawings created for locations on Bute demonstrate that the turbine will have a negligible impact on views across to the mainland. In part, the low level of impact is due to the distance between the development and Bute, which results in the narrow vertical structure of the wind turbine being difficult to discern. Any visual impact of the turbine is reduced as a result of the rising ground behind the machine acting as a backdrop. This fact is in direct conflict with comments in the handling report that the wind turbine could affect views of other parts of the Area of Panoramic Quality which covers Toward Point.

Approximately 800m to the south of the Ardyne Farm development site sits Castle Toward. Photomontage images from the original set of viewpoints (viewpoints F, G) and the visualisations from receptors identified by Mr Close (viewpoint B) both demonstrate that the Ardyne wind turbine would not have a negative impact on Castle Toward. In fact, it is unlikely that the machine will have any relationship with the Castle Toward structure due to thick tree growth screening the wind turbine from view in the area.

Concerns are expressed in the handling report about visual impact on the Chinese Lakes. Visualisations provided at the time that the application was under consideration clearly show that natural flora growth along the paths leading to the Chinese Lakes will prevent the Ardyne wind turbine from having any significant impact on the Chinese Lakes Designed Landscape.

Mr Close later decided that the viewpoint did not sufficiently demonstrate the impact that the machine would have on the Chinese Lakes. This was particularly disappointing to the applicant as the viewpoint had been handpicked by Mr Close. The photograph was taken in good faith that the resulting photomontage images would adequately address any concerns about visual impact. In order to thoroughly demonstrate for this review body that the Ardyne wind turbine would not have a significant adverse impact on the Chinese Lakes, additional information has been provided. These additional photographs looking across the lakes, and from paths within the Gardens, demonstrate that there will be a negligible visual impact on the setting as a result of the wind turbine installation. During months that all natural growth in the area is in leaf, the wind turbine will not be visible. We ask that the review consider this additional information against normal practice due to the circumstances which caused the absence of these visualisations in support of the planning application. This visual information could not be provided at the time when originally requested by Mr Close as a result of two key reasons. First, it was felt that the request for additional visualisations was unreasonable. The expectation that the Applicant should be put to further expense and effort as a result of Mr Close's dissatisfaction

with information from viewpoints that he specifically pinpointed was objectionable. Secondly, at the time that a request for additional information was made, Mr Close was fully aware of the fact that the Applicant, with whom he had recently discussed holiday plans in a telephone conversation, would be on vacation and not in a position to prepare the required information. Therefore, the timeframe issued for provision of the photomontages was clearly unrealistic. That any grounds for refusal are based as they are (see comments “It is considered that these issues have not been addressed in this submission.”) on lack of sufficient information, we would assert that efforts to provide such information were deliberately hampered by Mr Close’s actions.

Furthermore, in citing LP REN 1 rather than LP REN 2, we feel that Mr Close gives undue importance to the predicted impact of the Ardyne Farm wind turbine on the Chinese Lakes. Although LP REN 2 does note that the proposed development should not have an unacceptable adverse impact on highly valued landscapes including Gardens and Designed Landscapes, and sites of historic interest, LP REN 2 is not concerned with impact on core paths, rights of way, other important access routes, or important tourist routes. Although we feel that the Ardyne Farm installation would not significantly impact these considerations, the emphasis on routes or paths described in LP REN 1 gives undue importance to Mr Close’s examination of the possible impact of the wind turbine on the Chinese Lakes, which are both a potential tourist attraction and a network of paths. As per LP REN 2, the supporting visual information demonstrates that the Ardyne Farm will not have a significant adverse impact on the historically important Designed Landscape of Toward Castle (in the form of the Chinese Lakes).

Overall and as discussed above, the small wind turbine proposed for installation at Ardyne Farm will not have a significant negative visual impact on the surrounding landscape or historical environment and therefore is not contrary to policies STRAT DC 5, STRAT DC8, STRAT DC9, STRAT RE1 or policies LP ENV 1, LP ENV 10, LP ENV 11, LP ENV 19 or LP REN 2.

#### Strathclyde Cottage

Application 12/01265/FUL will have a low level of impact on general and residential amenity in the area. Within a 400m radius of the wind turbine there is only one property without a financial interest in the project. The property, Strathclyde Cottage, is a residential building situated approximately 170m to the southeast of the proposed development site.

LP REN 1 and LP REN 2 require that a wind energy development should not adversely impact visual, general and residential amenity.

Information submitted in support of the proposal shows that the wind turbine will not have negative impact on Strathclyde Cottage in terms of noise pollution or shadow flicker concerns.

Therefore, the area of concern in relation to Strathclyde Cottage revolves around predicted visual impact. In order to demonstrate the low level of visual impact that will arise at Strathclyde Cottage as a result of the Ardyne Farm wind turbine installation, a photograph has been taken from a point between the development site and the Cottage, looking back towards the Cottage. The image clearly shows that the Cottage is set at a lower elevation than the turbine, with a sharp banking lined with shrub and tree growth between the turbine and the property. It is evident that views from the Cottage will not be negatively impacted by the Ardyne Farm wind turbine.

From the same position, a photomontage has been prepared looking towards the wind turbine. The machine does not have an unacceptably dominant position along the skyline with distant hills rising to a similar height in the background and young tree growth to the north of the turbine sitting only marginally below the height of the wind turbine. To the left of the image, branches of a mature broadleaved tree demonstrate that the wind turbine will not be the tallest vertical element within view of Strathclyde Cottage. The scale of the wind turbine, when viewed from Strathclyde Cottage at its lower position to the base of the banking, will be further diminished when compared to the larger trees in the foreground.

With the amount of natural screening and visual clutter between Strathclyde Cottage and the wind turbine, it can be concluded that the wind turbine will not adversely impact the visual amenity of the property.

### Summary

In summary, the Ardyne Farm wind turbine proposal clearly complies with Argyll and Bute's planning policy and guidance. The turbine will not have an adverse impact on the surrounding landscape or the amenity of Strathclyde Cottage. The 20kw wind turbine installation will provide a clean energy solution for Ardyne Farm, dramatically reducing energy bills and providing an alternative source of income for the agricultural business. In approving the application, the installation will contribute to local and national renewable energy targets, and work towards sustaining a vital local business.