

**Delegated or Committee Planning Application Report and Report of handling as required by Schedule 2 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 relative to applications for Planning Permission or Planning Permission in Principle**

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**Reference No:** 13/00004/PP

**Planning Hierarchy:** Local

**Applicant:** Mr John Stirling

**Proposal:** Erection of two 225KW wind turbines (47.02 metres to blade tip) and associated meter houses, formation of crane hardstandings and vehicular access.

**Site Address:** Land west of Newton Park, Toward, Dunoon, Argyll

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**SUPPLEMENTARY REPORT NO. 3**

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**(A) INTRODUCTION**

Following the continuation of the application above at the Planning Hearing on Monday 4<sup>th</sup> November 2013, Members of the Planning Protective Services and Licensing Committee (PPSL) agreed to adjourn consideration of the application above in order to :-

1. Ascertain whether or not it would be possible to frame a competent motion to approve the application; and
2. To request that the Head of Planning and Regulatory Services seek further information from the applicant as to whether or not there would be operational constraints to the development if the two wind turbines were located further down the hill and, if so, what evidence could be advanced to detail the issues.

Given the above, additional supporting information has now been received from the applicant's agents VG Energy and this information contains relocated turbine locations and revised photomontages in addition to a justification for the amended siting and technical requirements.

**(B) FURTHER INFORMATION**

The applicant's agents VG Energy have submitted a 'Supporting Statement for Turbine Relocation' following the Planning Hearing. The agent comments that the original locations were considered to be the most appropriate and efficient for the turbines. Following the request from Members of the PPSL, further desk-based and on-site assessment has resulted in revised locations which the agent considers will reduce the perceived visual impact, while maintaining the viability of the project.

From revised drawing no. WV1024/010/A, the westernmost turbine T1 would now be located 60 metres west-south-west of the original location and sited 5 metres lower

than its previous height of 165 metres above ordnance datum (AOD). The easternmost turbine T2 would be sited 100 metres south-west of its original location and sited 8 metres lower than its previous height of 168 metres above AOD. The agent states that the relocated wind turbines have been situated more than 50 metres + blade length from the nearest linear feature, so as to comply with TIN051 guidance on bats, and the recommendations made in the Ecology and Ornithology Report from Machars Ecology.

At the revised locations, the agent considers that the impact of on-site turbulence will not be overly adverse, to the detriment of efficiency of the turbines. The agent confirms that the revised locations have been ratified on site by Endurance Wind Power who construct the Norwin turbines and confirmed that they would be satisfied enough with the revised locations to supply the applicant with the selected turbine.

The agent comments that whilst no anemometric testing has been carried out, this is an out-dated method of collecting data for small clusters of small/medium sized turbines. Computerised fluid dynamics analysis will take place on site prior to construction. Existing wind analysis demonstrates that without the significant impact of turbulence, a reduction in elevation below 160 metres AOD would lead to a 12-19% reduction in efficiency of the turbines.

The agent comments that despite the department's many requests for smaller turbine models, the turbines chosen for this scheme are the smallest model that can generate enough electricity to allow the project to remain viable. Due to the presence of trees on the site, it has also been fully explained that smaller turbines will not produce energy efficiently due to turbulence.

The agent has submitted a further eight photomontages with the turbines (coloured white) shown in their revised slightly lower positions. The agent questions the response made from SNH and the Council based on the Landscape Wind Energy Capacity Study (LWECS) in terms of screening and landscape guidance. VG Energy considers that the revised turbine locations coupled with an appropriate colour scheme would satisfy the guidance contained in the LWECS.

### **(C) OFFICER COMMENT**

Within the Council's approved Landscape Wind Energy Capacity Study (LWECS) the application site is located within the Cowal Ridges and categorised as 'Steep Ridgeland and Mountains' which have a 'high to very high' sensitivity to development as they are particularly prominent in important views. The application site however is at the lower extremity of this character type and very close to Rolling Farmland with Estates which increases sensitivity even further. Wind turbines greater than 35 metres in height are generally not encouraged in such landscapes.

The agents were originally advised that the particular wind turbine model and high siting would be regarded as being inappropriate in this location, but that smaller wind turbine typologies (i.e. less than 35m closer to the existing farm cluster or lower down the hillside in the more transitional zone) might well reduce landscape and visual impact to a point where development could prove acceptable. The 'Argyll & Bute Landscape Wind Energy Capacity Study' suggests that *"turbines less than 35m high could be sited on smoother lower hill slopes where they would benefit from a backdrop of rising ground. Darker coloured turbines may reduce visibility where seen predominantly against a backdrop of forestry or moorland"*.

The image from the LWECS which the agent has submitted in support of the proposed turbines does not respect the topographical situation at Toward in so far as the

turbines would still skyline from certain short and longer range views with no suitable backdrop.

The department considers that the scale of the turbines and their suggested relocated siting would still result in adverse visual impact when viewed from Toward School area, Rothesay and Craigmore, Bute, Bute ferry crossings, Firth of Clyde and from Inverclyde (Lunderston Bay and Inverkip Memorial). These views lack a suitable backdrop to help assimilate them in their landscape setting as advocated in the LWECS and by Scottish Natural Heritage. Only the short range views from the Meadows, Toward Point and Toward Loop Road may benefit from the revised siting. This could be further improved by the use of a darker colour for the turbines and blades.

Notwithstanding the agent's comments, the department considers that whilst an attempt has been made to improve the siting of the wind turbines by bringing them down the hillside to a level of 5 and 8 metres below that in the current application, the scale of the wind turbines in this particular location and lack of suitable backdrop for some of the key viewpoints would still result in adverse visual impacts and establish a precedent for inappropriately sized wind turbines in this prominent and sensitive area.

#### **(D) PROCEDURAL MATTERS**

Whilst the relocated wind turbines may slightly reduce visual impact from some (but not all) of the key viewpoints, the fact that they are located outwith the original application site boundary means that the suggested revised turbine locations could not be pursued as an amendment to the current application and would require a separate application for Planning Permission. Any fresh application submitted would of course be subject to further consultation with statutory bodies and would be open to comment by third parties and would need to be determined on its individual merits.

#### **(E) SUMMARY**

The department therefore considers that the proposal presented to Members at the Planning Hearing is still unacceptable in scale, visual and policy terms, but an alternative scheme with the relocated turbines may offer a solution which could overcome some, if not all of the shortcomings associated with the current application.

However, Members are requested to note that any such alternative could not be pursued as an amendment to the current application, as the proposed turbine locations lie outwith the original application site boundary.

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#### **(F) RECOMMENDATION:**

Having due regard to the Development Plan and all other material considerations it is recommended that the application be refused for the reason appended to this report.

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**Author of Report:** Brian Close

**Date:** 5<sup>th</sup> December 2013

**Reviewing Officer:** Richard Kerr

**Date:** 5<sup>th</sup> December 2013

**Angus Gilmour**  
**Head of Planning and Regulatory Services**

## REASONS FOR REFUSAL RELATIVE TO APPLICATION: 13/00004/PP

1. The proposed wind turbines, inclusive of the means of access required, are located on the southern slopes of Innellan Hill on the eastern side of the Cowal -Toward peninsula, within the 'Steep Ridgeland and Mountains' Landscape Character Type (ref '*Argyll & Bute Landscape Wind Energy Capacity Study* (LWECS) – Final Main Report and Appendix March 2012' - SNH/Argyll & Bute Council) and in very close proximity to the highly sensitive 'Rolling Farmland With Estates' Landscape Character Type.

The LWECS identifies that 'medium scale' typology turbines of between 35m and 50m will be difficult to assimilate in areas of smaller scale landform, with smaller scale patterns of land use, as they are likely to exert visual influence over wider landscape settings. It cautions against the introduction of larger scale turbines which could be seen on the skyline of the 'Steep Ridgeland and Mountains' LCT or against the most prominent coastal edge and promontories of this character type from the wider Firth of Clyde basin. The study concludes that the presence of larger scale turbines would adversely affect the strong sense of Cowal forming the threshold to the 'Highlands' and the point where the Glasgow conurbation is left, and that the present contrast of the landscapes of Cowal with the more developed Inverclyde and North Ayrshire coast could also be diminished. Turbines greater than 35m high would be likely to dominate the small scale and more diversely patterned settled valleys and coastal edges of this character type and the study considers that there is only potential for the smaller typologies, less challenging in scale, where there are may be opportunities to locate them on smoother lower hill slopes where they could benefit from a backdrop of rising ground.

At 47m in height to the blade tip and with rotor diameters of 29 metres, the proposed wind turbines would be wholly out of scale with their immediate and wider landscape context, where such large rotating structures would dominate the scale of the South Cowal hills which fall gradually towards the Firth of Clyde. The scale and motion of the proposed wind turbines would also impinge on adjacent small scale and settled landscapes and adversely affect the highly sensitive coastal edge including key coastal panoramas and views. The western side of the South Cowal peninsula is designated as an Area of Panoramic Quality (APQ) in recognition of the regional value and scenic qualities of this sensitive coastal landscape. The proposal impinges on the sensitive coastal skylines which frame and provide a setting for the Firth of Clyde, where development on this scale would undermine these qualities to the detriment of landscape character contrary to Local Plan Policy LP REN 1 by virtue of visually dominating a currently undeveloped and prominent landscape. Approval of the proposal could establish a harmful precedent for such large wind turbines in a relatively small landscape setting, where smaller turbines already exist and do not exert such a degree of influence over the appreciation of the coast and those landscapes which are characterised by the contrast between the land and the sea.

The proposal by virtue of its scale, its elevated location in the landscape and the motion associated with a large diameter rotor will adversely alter the setting and views from adjacent small scale and settled areas including Toward, Toward Point, Port Bannatyne, Rothesay and Ascog. It will also impinge on views from many settlements along the A78 from Largs to Gourock and sea views including the main ferry crossing from Wemyss Bay to Rothesay by virtue of the turbines becoming an identifiable skyline feature on the prominent Cowal peninsula tip. The scale of the wind turbines proposed results in sky-lining from a number of key viewpoints (Photomontage nos. 02, 03, 05, 06, 07, 08, 14, 15, 18, 20) that cannot be mitigated against by surrounding topography or plantation forestry. Other viewpoints rely on the presence of existing plantation woodland to provide a suitable backdrop to avoid sky-lining but this woodland is scheduled for felling thereby increasing the sky-lining effect further.

The foregoing environmental considerations are of such magnitude that they cannot be

reasonably offset by the projected direct or indirect benefits which a development of this scale would make to the achievement of climate change related commitments.

Having due regard to the above, it is considered that this proposal would have a significant adverse impact on Landscape Character, would adversely affect a number of key views and would degrade designated scenic assets including the Firth of Clyde coastline and adjacent 'Area of Panoramic Quality'. It is therefore inconsistent with the provisions of the Scottish Planning Policy and Scottish Government's Specific Advice Sheet on Onshore Wind Farms; Policies STRAT SI 1: Sustainable Development; STRAT DC 5: Development in Sensitive Countryside, STRAT DC 6: Development in Very Sensitive Countryside; Policy STRAT DC 8: Landscape & Development Control; STRAT DC 9: Historic Environment & Development; Policy STRAT RE 1: Wind Farm/Wind Turbine Development of the 'Argyll & Bute Structure Plan' (approved 2002), to Policy LP ENV 1: Development Impact on the General Environment; LP ENV6 Development Impact on Habitats and Species; LP ENV 10: Development Impact on Areas of Panoramic Quality; Policy LP ENV 11 Development Impact on Historic Gardens and Landscapes; LP ENV 13(a) Development Impact on Listed Buildings; LP ENV16 Development Impact on Scheduled Ancient Monuments; LP ENV 19 Development Setting, Layout and Design (including Appendix A Sustainable Siting and Design Principles); LP REN 1 Wind Farms and Wind Turbines; of the 'Argyll & Bute Local Plan' (2009) and the Argyll & Bute Landscape Wind Energy Capacity Study (LWECS) – Final main report and appendix March 2012.