

09/00247.

**Richard Smith**

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**Sent:** 22 June 2009 12:16  
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**Subject:** Myreton Wind Turbines



Myreton  
turbines.doc

Richard,

Attached are my comments on Departure matters. As I said, and as you will see from my notes, there is a lot of interpretation required before arriving at a conclusion as to acceptability.

This will follow when their submission is read in more detail; consultee comments are read; site visit undertaken, and further assessed against policy and SPG.

In the meantime these comments should allow you to proceed to advertise.

Mark

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**Application 09/00247 : Install two 800kw wind turbines at Myreton Crossroads, Keith**

Although for only 2 turbines (making a total of 3 altogether), and smaller than other "wind farm" applications, this is a commercial proposal which will be selling electricity to the national grid, as opposed to own/domestic use. Accordingly it falls to be considered against the development plan as follows.

**Development Plan Departure Considerations**

**Structure Plan policy 2(b)** : protecting the wider natural environment....from inappropriate development.....

**Consideration** : would depend upon whether the proposal was regarded as being visually intrusive and affecting views and landscape. Although photographs are provided, this would require a site visit to fully assess.

**Structure Plan policy 2 (l)** : promoting opportunities for the sensitive development of renewable energy.....

**Consideration** : This is a general policy in support of renewable energy proposals, but they should be sensitive, which brings in policy 2(b) again.

**Local Plan**

In addition to individual policies which might apply, there is Supplementary Planning Guidance on Wind Energy Proposals, which should be referred to. The applicants have provided Additional Planning Information, and it will be a matter of interpretation whether this has sufficiently addressed the requirements of policy and SPG.

There are no natural environment policies which would apply, the site being outwith any scientific, archaeological or landscape designations. The proposal does not involve prime agricultural land. Consultation with other bodies has confirmed no ecological; birds or wider biodiversity issues.

Under policy **EP8** Pollution, Noise implications would have to be considered. SPG requires a noise impact assessment to be carried out Environmental Health will need to confirm if the information supplied is satisfactory in this respect.

Consultation with the Forestry Commission would be necessary to confirm whether the development would affect the woodland under the terms of **ER3**. It is noted that there has been consultation on Ecological matters, but not on management/operational aspects of the forest.

The key points of **IMP1** requires a judgement call on

- (a) scale, density and character being appropriate to the surrounding area
- (b) whether the development integrates into the surrounding landscape

Policy **ER1** was specifically drafted for renewable energy proposals, and now has supporting SPG, incorporating preferred search areas.

Also relevant is NPPG 6, and PAN 45, which present the National perspective for dealing with renewable energy technologies.

### **Comment**

This proposal now requires an additional 1.3 km overhead cable in order to connect with the 33kV grid. This aspect does not form part of the application (statutory undertaker PD?) but this element could arguably have a greater visual impact than the turbines subject of the application. Part of the acceptance for the original turbine was that supply of energy to the grid was to be by underground cable.

There is also reference to using hardcore from a quarry that is not too evident from photos or on OS map. Does it exist and what is its status, or are there agricultural or other PD rights here as well?

The Additional Planning Information Report, has a section on Planning Policy, but this is all against National Policy and does not address Development Plan Policy and SPGs.

The site is not located within a preferred search area, and is thus **is a Departure to ER1**. The SPG does provide for circumstances where a development in an “unlikely” area will be permitted, but this would require lengthy consideration of the supporting information.

The proposal would also constitute a **Departure against IMP1**, as it cannot be considered to be in scale, or character with the surrounding area nor integrated into the landscape (this would not preclude being regarded as an *acceptable* departure due to particular circumstances.)

For similar reasons, the proposal would have to be regarded as a departure from the Structure Plan **policy 2(b)**.

There is also an issue of cumulative impact to be considered, involving the original approval plus the nearby Balnamoon turbine.

SPG considerations, expanding on policy, are

- Landscape and visual impact – criteria have been complied with in terms of ZVI maps; photomontages; viewpoints
- Natural Environment – Agencies consulted and no concerns expressed
- Built Environment - Agencies consulted and no concerns expressed
- Tourism and Recreational Facilities –not addressed; part of the core paths network runs through the site utilising tracks, so consultation with Access Officer advised may be implications for **policy CF3** if concerns
- Infrastructure – road access considered acceptable for previous application; some small sections of additional track required and shown. Vehicle movements assessed and can be commented on by Transport Manager.

Development now requires overhead cables to connect with national grid, on economic viability grounds. No details. PAN 45 recognises that landscape and visual impact of turbines is influenced by (inter alia) "ancillary components like power lines...." SPG asks for details of the design, location, height, but all that is supplied is a route plan.

- Pollution- noise (and shadow flicker) has been covered. Environmental Health to advise if Noise Impact Assessment satisfactory  
No reference to assessment of drainage; run off; flooding or any prior consultation with SEPA. Maybe that this is too small a development to have any implications in this respect?
- Proximity to Settlements – impact on closest properties has been assessed
- Aircraft – consultation with MoD confirms no issues for aircraft/radar.
- Community Consultation – no evidence, but again probably too small to justify a community consultation exercise. Any objections that might qualify?
- Cumulative impact – photo montages do include Balnamoon, but site visit really needed to assess feeling for impact on wider area/open countryside; other sites in general area. (Aultmore?)(Aberdeenshire?)

## **Conclusion**

**At this stage of the proceedings the application is a Departure from Structure Plan Policy 2(b) and from Local Plan policies ER1 and IMP1.**

Only after fully examining all information supplied; consultations; visiting the site and then making a value judgement based on interpretation of above, will it be possible to conclude whether the development is an acceptable departure.

It is a bit disconcerting that the approval for the single turbine has developed into a proposal for 3, with associated overhead line and pylons, solely because the original, single turbine became economically non viable. There must be concerns about the visual impact of all of this for the benefits resulting from 3 turbines, with the possibility of more to justify the initial investment.