

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.

There are a number of policy considerations to be taken into account. These are considered individually as follows

1. Structure Plan

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.

2. 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. (This SPG has material consideration status, and will not, unlike more recent SPGs, become part of the Local Plan)

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.

Assessment

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, along with other consultee response.

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)**.

3. Supplementary Planning Guidance

expanding on policy, the criteria are

- Landscape and visual impact – criteria have been complied with in terms of ZVI maps; photomontages; viewpoints, and a cumulative study has now been supplied 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, (para 4.5) 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 –
This has been done only for the turbines in the immediate vicinity of the application site, and should have taken account all consented and built turbines in the radii given in para 2.3.2 of the SPG. The purpose of this is to establish if the landscape is becoming “cluttered” with turbines, and the character of the countryside is affected as a result.
These are large turbines (55m tower with 24m radius blades, total height 79m). This compares to the Balnamoon turbine which has a 44m tower and 26m blade (height 70m). The new turbines are therefore over 10% taller.

4. Moray and Nairn Landscape Assessment (SNH 1996)

This study classes the application area as “Upland Farmland”, comprising broad, gently undulating slopes rising in close proximity to the coast, cut by gently graded valleys to the higher lands of the Open Uplands, and punctuated by distinctive conical hills such as the Bin of Cullen and Knock Hill.

Windfarm development is identified as a potential landscape change, and it is regarded as important to conserve the positive features of the landscape, such as the extensive views and general open character.

In visual terms there is felt to be scope for accommodating a limited amount of windfarm development due to the simple character of the landscape elements (landform; vegetation patterns; settlement), which would help reduce any feeling of clutter. It will be important to consider several aspects

- Avoidance of intrusion on the long views east to the Buchan Plain, and south to Ben Rinnes from key viewpoints
- Layout of turbines to respond to smooth curving hilltops, and to margins of forestry
- Limit the number of turbines in each development and consider the cumulative impact so as to avoid a cluttered appearance, which may conflict with the simplicity of the landscape.

5. Landscape potential for Wind Turbine Development (SNH 2004)

This study evaluated the sensitivity of landscape character to wind turbine development and was a key factor in developing the Preferred Search Areas for the SPG.

Balnagoon/Myreton area is within an area with moderate landscape character sensitivity. It was accorded low potential for either large, medium or small wind turbine developments. This is confirmed by the area's exclusion from a Preferred Search Area.

Overall Conclusion

The application is considered to be a Departure from Structure Plan Policy 2(b) and from Local Plan policies ER1 and IMP1. It is outwith a preferred search area as identified in SPG.

These two turbines are being used to justify the cost of connecting the previously approved turbine to the grid. This in itself gives concern as this will be via pylons/overhead cables, adding to the potential clutter it is sought to avoid.

A further 2 turbines are subject of an application on a neighbouring site and the proprietor of the Balnagoon turbine has stated an intention to install a further 4 turbines (see attached press report)

This gives concern to the longer term potential for a build up of turbines in this general area, which is not a preferred search area for small windfarms. (The Aultmore application is largely within a PSA).

Given the national drive to support renewable energy, and the "can-do" culture being encouraged within Planning, it may have been possible to make a case for these 2 turbines being acceptable; not creating a clutter; and being incorporated into the landscape.

However their approval would create a precedent for further ad hoc turbine applications (this could in fact be said to already be happening following the two individual turbine approvals) in a non-favoured area.

This does not represent a very strategic approach to renewable energy provision, and for making contributions to the national grid. This is the whole point of the Wind Energy SPG; the identification of preferred search areas – to promote the take up of suitable sites for small; medium and large windfarms. Even then, preferred search area status does not imply a presumption in favour of being granted planning consent.