22 OCT 2014

ALVAH AND FORGLEN COMMUNITY COUNCIL

Wood of Shaws,
ALVAH,
Banff AB45 3UL.

October 2014

Dear Mr. Martin,

APP/2014/2930 | Erection of Wind Turbine on Govel Hill, Stonieley, Alvah, Banff

Alvah and Forglen Community Council considered the subject planning application at its meeting on 30 September. The Community Council unanimously agreed that the turbine would have an adverse effect on the Alvah and Forglen community, particularly those living in close proximity to the proposed site and also those living in and around the Deveron Valley. **The Community Council therefore calls for its rejection.**

The Community Council concluded that the proposed turbine would be inappropriately sited on the slopes of The Deveron Valley and that there would be an adverse cumulative impact when considered with other turbines erected in the area. Due to the size and positioning of the turbine it would have an overbearing visual impact on nearby residences resulting in a significant loss of amenity to residents.

Factors taken into account were:

(i) **Local Opposition**. With some 6 weeks to go before the closing date for comments, the council was struck by the very large number of objections already lodged. All objections were from those who live in or around the Deveron Valley.

(ii) **Landscape Capacity.** The proposed turbine is 74 metres tall. The SNH Strategic Landscape Capacity Assessment for Wind Energy in Aberdeenshire reports that there is zero capacity for turbines over 30 metres in height in the proposed area and that the area is already over its underlying and remaining capacity.

(iii) **Visual Impact.** The proposed turbine would be located at a height of 140 metres, approximately 100 metres from the edge of the Deveron and Upper Ythan Valley, on the highest, most prominent ridgeline. Because of its dominance the turbine would have a significant and detrimental visual impact on the Deveron and Upper Ythan Valleys. Due to its position and height there would be no obscuration by trees or vegetation. It would be seen from Banff, Macduff, Portsoy Cullen, Turriff and as far away as the Huntly area.

(iv) **Local Amenity.** The proposed turbine would be sited less than 800 metres from Kirktown of Alvah. It would dominate this attractive hamlet. The noise from the Brydock turbines, 2km away, can already be heard in Kirktown of Alvah. The overbearing dominance of the turbine and the potential excessive noise would have a significant adverse effect on the amenity of the residents of Kirktown of Alvah.

(v) **Cumulative Effect.** When considered in conjunction with other turbines in the area the cumulative effect would be unacceptable. There are over 23 approved or erected turbines within a 5 km radius of the proposed turbines. There are over 40 approved or erected turbines within a 10km radius. There is no remaining capacity in this area.

(vi) **Historic Sites.** From the Grade A listed Banff Bridge the proposed turbine would be seen in conjunction with the Strath of Brydock and Cowie Hill turbines further adversely affecting the view over Duff House. The turbine would also be seen clearly from the Grade A listed Bridge of Alvah, and the listed or scheduled Eden Castle, Inchdrewer Castle, Kirktown of Alvah church and graveyard plus the Alvah and Stirling Cairns.

(vii) **Organic Growth.** Kirktown of Alvah is designated in SG Rural Development 1 as an area suitable for organic development through housing. It is a very attractive and desirable place to live. The specific area selected as suitable for housing would be directly below and dominated by the proposed turbine. It is unlikely that property sites less than 900 metres from a noisy overbearing turbine would be marketable. The proposed application, therefore, makes the aims of Rural Development 1 impractical for Kirktown of Alvah. The longer term effect of no organic growth would be the slow decline of this settlement.

(viii) **Precedents.** There are two significant precedents:

a. A proposal for two turbines on the same site in 2013 was rejected by the Banff Councillors due to its adverse effect on the Deveron Valley, the cumulative impact, its overbearing dominance of Kirktown of Alvah and the loss of amenity to residents in Kirktown of Alvah.

b. An application for a single 27 metre turbine 900 meters further down the same Govel Hill slope was rejected by the Scottish Government Reporter in 2013 due to its adverse cumulative impact on the Deveron Valley landscape. The Reporter noted that "this is an area of very attractive countryside that merits careful protection."

Attached is an annex with a more detailed assessment of the application against current planning policy.

Yours sincerely,

[redacted]

Rosemary Dewhurst,

Chairman Alvah and Forglen Community Council

ANNEX

Location.

The turbine would be located near the top of Govel Hill, on the most prominent ridgeline in the Turriff to Banff section of the Deveron Valley. This area is classified as Upper Deveron and Ythan Valley Landscape Character Area (LCA) 24(i). The turbine location is adjacent to LCA24(i) in LCA 7(ii) Western Coastal Farmland.

Strategic Landscape Capacity Assessment for Wind Energy in Aberdeenshire.

This study, carried out by Ironside Farrar on behalf of Aberdeenshire Council and SNH, provides an authoritative view on the capacity of the Aberdeenshire Landscape to accommodate Wind Turbines.

The report has stated guidance for the Deveron Valley LCA24(i) and adjacent areas and notes zero capacity for turbines higher than 15 metres in the Deveron Valley LCA24(i) and also zero capacity in the neighbouring adjacent area of LCA 7(ii) for turbines of 30 metres or higher height.

The proposed turbine is 74 meters high so clearly fails to meet this basic test.

Cumulative Impact.

There are over 23 approved turbines within a 5km radius of the proposed site.

The Strategic Landscape Assessment Study notes that this is an area where current cumulative impact limits capacity for further development.

With 23 adjacent turbines the proposed turbine fails to meet this basic test. When combined with the height restrictions mentioned in the above section, it is clear that the proposed site is totally unsuitable for a 74 metre turbine.

Distance between Turbines.

The Strategic Landscape Assessment Study reports the minimum distance between medium/large turbines (classification under which the propose turbines falls) in LCA 7(ii).

The actual distances from the proposed turbine are:

Large Turbine Clusters – 5km to 10km separation distances

- Strath of Brydock (3 x 100m operational) – 1.8km

Medium/Large Turbine Clusters – 5km to 10km separation distances

- Cowie Hill (1 x 80m construction started) – 2.7km
- South Coleonard (1 x 79m consented) – 3.8km

- Doune Park (1 x 80 m operational) – 4.35km

Medium Turbine Clusters – 3km to 6km separation distances

- Auchinbadie (1 x 45.5m construction started) – 1km

Small Turbine Clusters – 2km to 4km separation distances

- Itlaw (2 x 27m operational) – 1.95km

The above again shows that the application falls well short of meeting the basic test.

Noise

There is no empirical data in the application to show that noise limits would not be exceeded at the closest dwelling houses. With an initial output of 102dB it is probable that the allowable level of 35db at dwellings would be exceeded. Aberdeen Council Planning Advice suggests that the smaller Enercon E33 (330kw compared to 440kw: rotor diameter 33m compared to 48m) should have a separation distance of 630m.

There is no empirical evidence that the turbine would not exceed permitted noise levels.

Visual Impact

The proposed turbine location would be 785m to 1000m from the houses in Kirktown of Alvah, between 990m to 1325m from the houses close by Kemplemyres to the south and approx. 1325m from the houses at Deveron View Cottages to the east. At 74m high the turbine, located at 140m on the upper slopes of the highest hill in the area, would have an overbearing visual impact on these nearby properties.

The applicants ZTV documents show that the turbine would be highly visible from a large area of the Deveron Valley stretching from Fortrie to Turriff to Banff on the south and east bank of the Deveron, and from Forglen to Banff on the West bank of the Deveron. It would also be seen from the Huntly area, Macduff, Portsoy and Cullen.

The turbine would have an adverse visual impact on those living within the Deveron Valley and further field, and also on the beauty and integrity of the landscape within the valley.

Historic Environment

The turbine would be highly visible from Banff Bridge, Bridge of Alvah, Eden Castle, Inchdewer Castle, Kirktown of Alvah Church, Manse and Graveyard, and Alvah and Stirling Cairns.

The turbine would have an adverse impact on all of those historic sites.

Scottish Government Policy

Current policy is that wind turbines should only be located where the landscape can accommodate them

The proposed turbine, sited on a prominent ridgeline on the highest hill on the beautiful Deveron Valley, fails to meet this basic criterion.

Summary

For the reasons stated above the application is flawed and is counter to:

- Aberdeenshire LDP2012 and SG policy 3: Development in the Countryside, and SG Rural Development 2: Wind Farms and Medium to Large Turbines
- Aberdeenshire LDP2012 Policy 8: Layout, Siting and Design of New Development, and SG lSD2: Layout, Siting and Design of New Development
- Aberdeenshire LDP2012 Policy 12: Landscape Conservation, and SG Landscape 1: Landscape Character.
- Aberdeenshire LDP2012 Policy 13: Protecting, Improving and Conserving the Historic Environment, Historic Environment 3: Historic Gardens and Designed Landscapes.
- SNH guidance in the Strategic Landscape Capacity Assessment for Wind Energy in Aberdeenshire.