

MSC

Summary Precognition of Mark Steele BA. Dip LD. CMLI
Mark Steele Consultants
Public Local Inquiry: 17 March 2009

Baillie Wind Farm
Barnaheigh Farm, Westfield, By Thurso, Caithness
DPEA Reference: IEC/3/105/3

02 March 2009

1.0 QUALIFICATIONS AND EXPERIENCE

My name is Mark Steele and I am a Chartered Landscape Architect as well as a Member of the Landscape Institute. I have over 25 years' experience of landscape planning and design.

2.0 EVIDENCE SCOPE

My evidence relates to the potential landscape and visual effects of the proposed development.

3.0 SITE AND ENVIRONS

3.1 The Site

Twenty-one turbines are concentrated to the west of a 560ha site. The overall height of the turbines is 110m from base to blade tip.

The site is positioned on the western flank of the Hill of Shebster a prominent ridge running on a north / south orientation. Secondary ridges have a north-easterly and easterly orientation.

3.2 Site Environs

A number of the oldest ancient monuments in Caithness are located along the Hill of Shebster ridge. Turbines are proposed as close as 500m to these monuments.

3.3 Adjacent Communities

The communities of Shebster and Westfield are immediately to the south-west and south-east of the development site. Six smallholding

communities form an arc from the west through north to the east of the development site.

4.0 OBJECTION

4.1 Basis of Objection

The Highland Council objected to the application of the basis that it is contrary to the Local Plan, SPP6, guidance on cumulative impact, the Highland Renewable Energy Strategy as well as issues raised by RSPB and Historic Scotland.

My evidence principally deals with proximity, cumulative impact and visual impact.

4.2 Proximity to Dwellings

The proximity of turbines to dwellings is as follows:

- 7 dwellings are located within 500m,
- 25 dwellings are located within 1km,
- 61 dwellings are located within 2km.
- 158 dwellings are located within 3km.

4.2.1 SPP6 – Renewable Energy

SPP6 (CD18) Annex A Communities states that proposals should not be permitted *‘if they would have a significant long term detrimental impact on the amenity of people living nearby’* and confirms support for a 2km separation distance.

SPP6 paragraph 48 states that *‘Applicants should use the assessment process to demonstrate the appropriateness of the chosen location for accommodating development.’*

The applicant has failed to demonstrate the appropriateness of the site location on the basis of proximity, as there are 61 dwellings within 2km.

4.2.2 Highland Renewable Energy Strategy

The Highland Renewable Energy Strategy (CD10) Policy S.2 is unequivocal and states that *'Devices should be positioned so as to maintain at least a one km separation zone between dwellings and wind turbines'*.

All twenty-one proposed turbines are within 1km of a dwelling and there are twenty-five dwellings within 1km of one or more turbines.

4.4 Cumulative Impact

An updated CLVIA has been prepared by the appellants (BWL40) and it should be noted that there are only three cumulative viewpoints. Additional viewpoints would have allowed a more comprehensive understanding of cumulative impact.

I have assessed the three cumulative viewpoints and judge that cumulative effects on viewpoints 13 and 21 remain as moderate/minor and moderate. However my assessment of the cumulative effects on viewpoint 25 increases the significance of effects in the ES Addendum from moderate to major.

My principal precognition also identifies a number of other viewpoints that would be subject to significant effects.

I have also assessed the three closest wind farms to Baillie and judge that cumulative effects would be major with Forss, moderate with Hill of Lieurary and major with South Shebster.

4.5 Visual Impact

4.5.1 Visual Impact assessment

I have visited the site, its environs and all the viewpoints identified in the ES Addendum.

I have reassessed potential effects and my assessment demonstrates that the revised proposals do not mitigate landscape and visual effects but compound them.

4.5.2 Highland Renewable Energy Strategy

The Highland Renewable Energy Strategy paragraph 8.2.6 Visibility states that: *'The extent to which this visibility is accepted depends upon the distance of the objects from the viewer, the size and arrangement of the objects and the backdrop of the objects.'*

The turbines remain within 1km of dwellings and whilst the overall size of the development has reduced the geometric arrangement will make it a more prominent feature within the landscape. Significant visual effects have therefore not been reduced.

4.5.3 SNH Guidance

Paragraph 2.4.1 *Rationale* of *'Guidelines on the Environmental Impacts of Windfarms and Small Scale Hydroelectric Schemes'* emphasises the need to *'determine what the key characteristics of a landscape are, and then considering the relationship of all aspects of*

the windfarm in direct relation to these, from the setting of the windfarm as a whole to the location and pattern of the turbines...'

The landform characteristics of the site and its environs are not simple but are a complex interplay of elevation, orientation and landuse.

The revised wind farm layout does not respond to the landform but simply imposes a geometric triangular grid across an arbitrary area of land ownership that has been constrained by proximity to dwellings and transmission line easements.

5.0 ENVIRONMENTAL STATEMENT

The following critique concentrates on the ES Addendum document and is based upon the non technical summary.

5.1 Project Revisions

In my opinion, when the negative effects of the more geometric configuration are considered alongside the minimal positive effects of the revisions no overall landscape or visual benefit has been gained.

5.1 Effects on Landscape Resource

The significance of the Hill of Shebster is both acknowledged and enhanced by the presence of a series of ancient monuments. In my opinion this landscape resource is of high sensitivity and will experience a high magnitude of change and will therefore be subject to major effects.

5.2 Effects on the Perception of the Landscape

This section of the Non-Technical Summary states that: *'There are 13 landscape character types within the study area, and only one has been assessed as experiencing a significant effect, at Dunnet Bay. The other landscape character types are assessed as undergoing effects which range from moderate to negligible.'*

It should be noted that moderate effects constitute significant effects in accordance with the EIA regulations.

5.3 Visual Effects

It is implied that a high proportion of significant visual effects are acceptable, as the character of the landscape is considered appropriate for wind farm development. In my opinion the high proportion of significant visual effects simply illustrates the extent to which the proposed wind farm will dominate the landscape as well as the inappropriateness of the location.

This section also concedes that the proposed wind farm is within a *'developed area'* and that significant effects are a consequence of its location. In my opinion this confirms that the wind farm is poorly located.

5.4 Sequential / Cumulative Effects

The cumulative impact assessment has been updated and is discussed in paragraph 4.4.3 of my principal precognition. Sequential effects are discussed in paragraph 5.5 of my principal precognition.

5.5 Landscape and Visual Impacts - Conclusions

This section of the Non-Technical Summary states that: *'The site itself provides an appropriate receiving environment for the wind farm in that the local landform is simple and large-scale and from the middle distance, of around 5 to 6km, the site area appears as a simple, horizontal ridge without any local detail or scale comparisons that can emphasis the large size of the turbines.'*

This statement is misleading as the landform is complex and comprises a diverse range of elements including numerous dwellings, transmission lines etc. All provide scale comparisons that will emphasis the large scale of the turbines.

This section then implies that significance is diminished when effects do not extend over a whole landscape character area, or to towns or over large sections of transport corridors. This is not the case as it is dependent upon the nature of receptors as well the cumulative effects of other wind farm developments.

5.6 Cultural Heritage

This section concedes that there are significant effects upon the setting of ancient monuments. A more comprehensive discussion of effects on cultural heritage is in section 7 of my principal precognition.

6.0 SCOTTISH NATURAL HERITAGE POSITION

6.1 Consultation Responses

In the SNH letter dated 30 August 2004 (CD3) *'objects to the proposal as currently submitted.'*

In the SNH letter dated 10 March 2006 (CD3) their position had changed to *'It is our opinion that the landscape and visual impacts of this proposal when considered on its own are acceptable.'*

In my opinion SNH were misguided in this change of stance.

6.2 Landscape and Visual Impacts

Paragraph 2.2 (vi) of the SNH letter dated 10 March 2006 (CD3) identifies a number of revisions that *'...minimise adverse impacts on the landscape and visual amenity...'* and conclude that any benefits arising from the revised layout are minimal.

SNH *'are broadly in agreement with the findings of the Addendum'* however they also acknowledge that *'impacts will be slightly less than for the original proposal'*. A slight reduction in impact would not, in my opinion, warrant a withdrawal of the SNH objection.

6.5 Cumulative Impacts

The cumulative impact assessment has been updated and is discussed in paragraph 4.4.3 of my principal precognition.

6.6 SNH Conclusion

In my opinion the SNH decision to remove their objection was misguided, as it does not take account of guidance on the proximity of turbines to dwellings, the relative landscape significance of the Hill of Shabster ridge or effects arising from the geometric configuration of the revised turbine layout.

7.0 THE HISTORIC SCOTLAND POSITION

Historic Scotland clearly places an emphasis on the setting of the monuments and this is a theme that continues throughout their consultation correspondence.

Historic Scotland mounts a robust and convincing defence of their position in their letter dated 17 January 2007 which concludes that: *'Historic Scotland remains of the view that this application will have an unacceptable adverse impact on the setting of a number of scheduled monuments including the Cnoc Freiceadain cairns...'*

8.0 THE HIGHLAND COUNCIL PLANNING COMMITTEE REPORT

8.1 Caithness, Sutherland & Easter Ross Planning Applications and Review Committee. Planning Report

The planning report places too much emphasis on the findings of the ES Addendum as well as the misguided SNH decision to withdraw its objection.

It is also factually incorrect with regard to the geometry of the wind farm and understates the number of dwellings within close proximity as well as the significance of effects. It also understates the significance of effects upon the adjacent ancient monuments.

The report also implies that landscape and visual impact is nearly a subjective issue rather than a matter that can be tested through professional analysis. The report is misguided in this assumption as well as its recommendation.

9.0 CONCLUSION

The Caithness and Easter Ross Planning Application and Review Committee were fully justified in their decision to object to the proposal as the development would:

- be within 1km of dwellings and is therefore contrary to Policy S.2 of the Highland Renewable Energy Strategy which relates to proximity;
- be within 2km of communities and would have a significant long term detrimental impact on the amenity of people living nearby. It is therefore contrary to the guidance of SPP6;
- cause significant adverse visual impacts upon the residents within the dispersed community surrounding the development;
- cause significant adverse visual and sequential impacts upon users of the A836 coastal route (also a tourist route) and the C1 road between Thurso and Isauld (also promoted as a national cycle route);
- cause significant adverse impacts upon the landscape setting of adjacent ancient monuments as well as significant visual effects upon visitors; and
- cause significant adverse impacts on the wider landscape and would have the potential to contribute to cumulative and sequential impacts that would create a wind farm landscape character type.

I submit that the reporter should determine that the proposed Baillie Wind Farm should be refused planning permission in agreement with the recommendations of the Highland Council.