

Perth and Kinross Council
Development Management Committee – 10 June 2015
Consultation Response by Development Quality Manager

**Consultation response on Section 36 application in Angus for the proposed
Macritch Wind Farm on land close to Backwater Reservoir, Kirriemuir, Angus**

Ref. No: 15/00001/CONSUL

Ward No: Not applicable

Summary

The Scottish Government's Energy Consents Deployment Unit has sought comments from Perth and Kinross Council in respect of an application in Angus submitted under Section 36 of the Electricity Act 1989 to erect a wind farm of 18 turbines on land to the north and east of Backwater Reservoir, near Kirriemuir.

Perth and Kinross Council is a Statutory Consultee on this proposal. This report seeks approval for the Council's response to the consultation request from the Energy Consents Deployment Unit. The report highlights the relevant planning issues that are applicable to the administrative area of Perth and Kinross Council. In this case adverse effects are expected to occur and are significant enough to recommend that the Council objects to this proposal.

BACKGROUND AND DESCRIPTION

- 1 Perth and Kinross Council has been consulted by the Scottish Government Energy Consents and Deployment Unit on an application submitted under Section 36 of the Electricity Act 1989. The application is to erect an eighteen turbine wind farm with planned output of approximately 59.4 MW on land to the north and east of Backwater Reservoir, near Kirriemuir in Angus.
- 2 Due to the nature, scale and location of the proposal, it has been determined that the development is an Environmental Impact Assessment (EIA) development and as such, the proposal is supported by an Environmental Statement (ES).
- 3 The application will be considered by Scottish Ministers as determining authority as the consideration of applications for generating stations with a capacity of greater than 50MW fall within the remit of the Electricity Act.
- 4 In this circumstance the Council is a Statutory Consultee in the process. As such should Perth and Kinross Council object to the proposal, the Scottish Ministers would be required to hold a Public Local Inquiry before the application could be determined.
- 5 The proposed scheme is located wholly within the boundaries of Angus Council about 4km from the Perth and Kinross boundary, 9km from Alyth and 14km from Blairgowrie. The eighteen turbines would be arranged in two specific

elongated groups with turbines one to nine forming the southern array with ten to eighteen forming the north. The southern array would be sited to the east of Back Water Reservoir with the northern array to the west of Glendamff Burn. The turbines would be up to 125 metres in height to the blade tip with a turbine hub up to 80 metres in height.

NATIONAL POLICY AND GUIDANCE

- 6 The Scottish Government expresses its planning policies through the National Planning Framework 3, the Scottish Planning Policy 2014 (SPP) and Planning Advice Notes (PAN).

National Planning Framework

- 7 The NPF3 is a long-term strategy for Scotland and is a spatial expression of the Government's Economic Strategy and plans for development and investment in infrastructure. Under the Planning etc (Scotland) Act 2006 this is now a statutory document and material consideration in any planning application. The document provides a national context for development plans and planning decisions as well as informing the on-going programmes of the Scottish Government, public agencies and local authorities.

The Scottish Planning Policy 2014

- 8 The Scottish Planning Policy (SPP) was published on 23 June 2014. It sets out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land. The SPP promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances. It directly relates to:

- the preparation of development plans;
- the design of development, from initial concept through to delivery; and
- the determination of planning applications and appeals.

- 9 Of relevance to this application are,

- 10 A successful Sustainable Place

- Paragraphs 74 – 83 Promoting Rural Development
- Paragraphs 92 – 108 Supporting Business & Employment
- Paragraphs 135 – 151 Valuing the Historic Environment

- 11 A Low Carbon Place

- Paragraphs 152 - 174 Delivering Heat & Electricity
- Paragraphs 175 – 192 Planning for Zero Waste

12 A Natural, Resilient Place

- Paragraphs 193 – 218 Valuing the Natural Environment
- Paragraphs 219 – 233 Maximising the Benefits of Green Infrastructure

Planning Advice Notes

13 The following Scottish Government Planning Advice Notes (PAN) are also of interest:-

- PAN 1/2011 Planning and Noise
- PAN 2/2011 Planning and Archaeology
- PAN 1/2013 Environmental Impact Assessment
- PAN 51 Planning, Environmental Protection and Regulation
- PAN 60 Planning for Natural Heritage
- PAN 68 Design Statements
- PAN 75 Planning for Transport

Onshore wind turbines – Online Renewables Advice December 2013

14 Provides specific topic guidance to Planning Authorities from Scottish Government.

15 The topic guidance includes encouragement to planning authorities to:

- development spatial strategies for wind farms;
- ensure that Development Plan Policy provide clear guidance for design, location, impacts on scale and character of landscape; and the assessment of cumulative effects.
- the involvement of key consultees including SNH in the application determination process;
- direct the decision maker to published best practice guidance from SNH in relation to visual assessment, siting and design and cumulative impacts.

16 In relation to any assessment of cumulative impacts it is advised that:

In areas approaching their carrying capacity the assessment of cumulative effects is likely to become more pertinent in considering new wind turbines, either as stand alone groups or extensions to existing wind farms. In other cases, where proposals are being considered in more remote places, the threshold of cumulative impacts is likely to be lower, although there may be other planning considerations.

In assessing cumulative landscape and visual impacts, the scale and pattern of the turbines plus the tracks, power lines and ancillary development will be relevant considerations. It will also be necessary to consider the significance of the landscape and the views, proximity and inter-visibility and the sensitivity of visual receptors.

DEVELOPMENT PLAN

- 17 Although outwith Perth and Kinross, the site is within the Tayplan area but Perth and Kinross Local Development Plan must be taken into account:-

TAYplan Strategic Development Plan 2012 – 2032 - Approved June 2012

- 18 The overall vision of the Tay Plan states *“By 2032 the TAYplan region will be sustainable, more attractive, competitive and vibrant without creating an unacceptable burden on our planet. The quality of life will make it a place of first choice, where more people choose to live, work and visit and where businesses choose to invest and create jobs.”*

The principal relevant policy is:-

Policy 6: Energy and Waste/Resource Management Infrastructure

- 19 Policy 6 is the most applicable policy and relates to delivering a low/zero carbon future for the city region to contribute to meeting Scottish Government energy targets and indicates that, in determining proposals for energy development, consideration should be given to the effect on off-site properties, the sensitivity of landscapes and cumulative impacts..

Perth and Kinross Local Development Plan 2014

- 20 The Local Development Plan was adopted by Perth and Kinross Council on 3 February 2014. It is the most recent statement of Council policy and is augmented by Supplementary Guidance.
- 21 The principal policies associated with this consultation response are, in summary:

Policy TA1B - Transport Standards and Accessibility Requirements

- 22 Development proposals that involve significant travel generation should be well served by all modes of transport (in particular walking, cycling and public transport), provide safe access and appropriate car parking. Supplementary Guidance will set out when a travel plan and transport assessment is required.

Policy CF2 - Public Access

- 23 Developments will not be allowed if they have an adverse impact on any core path, disused railway line, asserted right of way or other well used route, unless impacts are addressed and suitable alternative provision is made.

Policy HE1B - Non Designated Archaeology

- 24 Areas or sites of known archaeological interest and their settings will be protected and there will be a strong presumption in favour of preservation in situ. If not possible provision will be required for survey, excavation, recording and analysis.

Policy HE2 - Listed Buildings

- 25 There is a presumption in favour of the retention and sympathetic restoration, correct maintenance and sensitive management of listed buildings to enable them to remain in active use. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the building's character, appearance and setting.

Policy ER1A - Renewable and Low Carbon Energy Generation

- 26 Proposals for the utilisation, distribution and development of renewable and low carbon sources of energy will be supported where they are in accordance with the 8 criteria set out. Proposals made for such schemes by a community may be supported, provided it has been demonstrated that there will not be significant environmental effects and the only community significantly affected by the proposal is the community proposing and developing it.

Policy ER6 - Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Areas Landscapes

- 27 Development proposals will be supported where they do not conflict with the aim of maintaining and enhancing the landscape qualities of Perth and Kinross and they meet the tests set out in the 7 criteria.

Policy EP8 - Noise Pollution

- 28 There is a presumption against the siting of proposals which will generate high levels of noise in the locality of noise sensitive uses, and the location of noise sensitive uses near to sources of noise generation.

OTHER POLICIES

Perth & Kinross Wind Energy Policy & Guidelines (WEPG) 2005

- 29 This supplementary planning guidance was approved by Perth & Kinross Council on 18th May 2005. As Members are aware, the Council undertook extensive public consultation on its Wind Energy Policy and Guidelines and was approved by the Council in May of 2005.
- 30 However, in considering this particular proposal, account should be taken of the findings of Ms McNair (reporter) in relation to the Abercairny wind farm proposal, as well as the Council's experience in using the WEPG since 2005. The Council also recognises that following the publication of the Scottish Planning Policy, it is necessary to revisit and refine the precise wording of its supplementary planning guidance on wind energy, to ensure that it provides the

most up-to-date and helpful guidance for both developers and the Council in its consideration of planning applications for wind energy developments. I therefore consider that although the presence of this document should be noted, its weighting in the determination of this planning consultation response should be limited.

Tayside Landscape Character Assessment (TLCA)

- 31 The Tayside Landscape Character Assessment (TLCA), 1999, is published by Scottish Natural Heritage and remains a valid baseline resource. Whilst some of its guidance on wind energy is dated, owing to the much smaller size of turbines considered in the TLCA, other aspects of the study remain a useful resource.

Perth and Kinross Local Landscape Areas (Draft)

- 32 This draft supplementary guidance has been prepared to support Local Development Plan Policy ER6 "*Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes*". Consultation on the documentation ran for a period of 8 weeks from 28 November until 19 January 2015. A report was submitted to the Enterprise and Infrastructure Committee on 25 March 2015 (15/130) and post committee edits are now being undertaken before submission to the Scottish Ministers.

SITE HISTORY

- 33 Members will be aware that there is considerable pressure for windfarms in this locale. There are a number of operational and approved windfarms in the vicinity of the application along with others under considerations. The key sites are as follows:-
- Drumderg (operational) 16 turbine scheme at 107metres to tip.
 - Welton of Creuchies (consented) 4 turbine scheme 99 metres to tip.
 - Tullymurdoch (consented) 7 turbine scheme 120 metres to tip.
 - Corb (consented) single turbine scheme 84 metre to tip.
 - Saddlehill (under consideration) 14 turbine scheme 115 metres to tip.
 - Dulater (under consideration) 17 turbine scheme 125 metres to tip.

CONSULTATIONS

Internal

- 34 **Environmental Health** – no concerns with regards to noise at receptors within Perth and Kinross Council.
- 35 **Transport Planning** – Abnormal loads having travelled along the trunk road to the junction of the A90/A94/A929, would then utilise the A94, A928 and B951. It is also noted that construction traffic route as per figure 5.9 of volume 2 is

outwith the administrative area of Perth and Kinross Council. Transport Planning offer no objection.

- 36 **Conservation Planner** – It is not considered that the settings of local heritage assets will be significantly affected by this proposal taking account of topography and distance.

REPRESENTATIONS

- 37 The Energy Consents Unit (ECU) of the Scottish Government indicates that as of 7 May 2015 the number of representations received by them amounts to 209 individual letters and a petition with 684 signatures. The ECU indicates that all letters received at that date are objection letters.

- 38 The issues raised in objection letters do not all relate to issues that are applicable to the administrative area of Perth and Kinross. Those that are applicable are considered in the Appraisal section of the report. It should be noted that an objection from Stanley and Kinclaven District Community Council has been copied directly to this Council. The issues raised by the letters of objection are as follows:-

- contrary to policy and guidance;
- adverse landscape and visual impacts;
- cumulative impact with other windfarms;
- impact on the Cairngorms National Park;
- impact on wild land;
- noise from construction, operational noise & shadow flicker;
- impacts on residential amenity;
- lack of socio-economic benefits;
- impacts on recreation;
- adverse impacts on built heritage;
- adverse impacts on wildlife including protected species;
- impact on hydrology and hydrogeology (including private water supplies);
- Details of Grid Connection inadequate-Pylons not rules out;
- adverse impact on tourism and economy;
- Development unnecessary as Government renewables targets to 2020 already met;
- impact of construction traffic on local road network;
- inappropriate decommissioning;
- benefits do not outweigh disbenefits;
- inadequate and misrepresentative Environmental Statement (ES);
- Flood risk from water run off;
- Effects of public drinking water supply in Backwater Reservoir ;
- Alternative and less obtrusive renewable energy options are available;
- Pollution from chemicals used in construction and operation;
- Safety issues (including ice throw)
- Adverse health consequences
- Community benefits payments should not be considered
- Loss of property values – the loss in property value falls out with the remit

of the planning assessment.

- Turbines are inefficient and the energy benefits to the local economy is not proportionate to the environmental impact – a number of representations express concern at the support given through planning policy and Government Planning Guidance to the use of wind technology contending that it offers broad support to an inefficient technology which relies on the extensive use of natural resources through the production and construction process and relies on extensive public subsidy whilst delivering minimal climate change benefits.

Whilst these concerns are noted it must be acknowledged that Planning Policy does provide support for appropriately sited and designed wind farm development. In those locations where landscape and visual concerns are raised it will be appropriate for any decision maker to have regard to the amount of energy contribution to be delivered by a proposal and the extent to which that will contribute to Scottish Government commitment to generating an equivalent of 100% of electricity demand from renewable sources by 2020.

APPRAISAL

- 39 Schedule 9 of the Electricity Act states that, in formulating any relevant proposals, a licence holder or person authorised by exemption to generate, transmit, distribute or supply electricity shall have regard to *the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.*
- 40 In considering any relevant proposals for which consent is sought the Scottish Ministers require to have regard to these matters. The development plan represents a material consideration in assessing these matters. This appraisal is based on the development plan and other relevant material considerations relevant to the Perth and Kinross administrative area. Tayplan provides the general strategic planning context for the area in order to inform the preparation of individual local development plans. In relation to renewable energy proposals, the general objective is that provision should be made in an environmentally acceptable manner. However, Tayplan does not include detailed guidance that is directly relevant for the assessment of an individual wind farm proposal.
- 41 As noted earlier, the proposed wind farm is located in Angus outwith the administrative area of Perth and Kinross. From the internal consultation exercise it is clear that there are no concerns surrounding the road network, heritage assets or the potential for adverse impact on noise receptors within Perth and Kinross. Accordingly the windfarm proposal does not offend Local Development Plan Policy TA1B - Transport Standards and Accessibility

Requirements, Policy HE1B - Non Designated Archaeology, Policy HE2 - Listed Buildings nor Policy EP8 - Noise Pollution.

- 42 The key planning issue for consideration is that of the visual and landscape impact upon Perth and Kinross Council. Policy ER 1A - Renewable and Low Carbon Energy Generation and Policy ER 6- Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Areas Landscapes both refer to considering the landscape and visual impact, including the cumulative impact of the wind farm with other schemes.

Landscape Character

- 43 The applicant's ES confirms that significant effects upon landscape character would occur in two units as defined in their assessment, LCT 1d: Backwater Valley/Glen Damff and LCT 3: Highland and Summit and Plateaux. Elsewhere, they confirm that the effects of the proposed development upon Landscape Character would not be significant.
- 44 Figures 6.6A (blade tip) and Figure 6.6B (hub height) of the submitted ES show the zones of theoretical visibility of the Macritsch Scheme. Visibility in Perth and Kinross occurs on higher ground of the Highland Summits and Plateaux Landscape Character Type (LCT) and a substantial amount of the Bankfoot Lowland Hills LCT as well as the settled Strathmore Valley Lowland LCT as defined in the Tayside Landscape Character Assessment 1999 (TLCA). It should be noted that theoretical visibility is a worst case and in practice the extent of visibility would be less due to buildings, landscape features and small changes to topography.
- 45 Where visibility occurs in the wider landscape in Perth and Kinross, such as the Bankfoot Lowland Hills LCT and Strathmore Valley Lowland LCT at a distance of some 18km to 35km, the impact on landscape character is slight due to the distances involved and/or extent of visibility. Macritsch would be set behind the Highland Boundary Fault limiting any cumulative landscape impacts on these units and preserving views towards the fault line feature which marks the division between the highlands and lowlands. Comparison between the blade tip height ZTV and hub height ZTV also illustrates the reduction in visibility on these particular LCTs.
- 46 The ES acknowledges that there is an adverse impact on the Highland Summits and Plateaux. However, this is limited to units in close proximity to the Macritsch site and predominantly within the Angus Council Area. The 2010 David Tyldesley Associates (DTA) technical study prepared for Perth and Kinross Officers sub-divides some of the TLCA larger LCTs to enable a finer grained assessment. However in this case it adds little to the assessment as detailed above.
- 47 Draft supplementary planning guidance on special landscape areas within Perth and Kinross has been prepared. Having reviewed this draft document and because of the intervening distances I do not consider there to be issues that have not already been covered under the assessment of the TLCA units.

Visual Impact

- 48 Through Policy ER1A of the LDP there is a requirement to take account of visual integrity. Accordingly the potential visual impact in relation to residential properties, designated locations, roads, recreation and sporting activities has to be considered.
- 49 Out of the 31 viewpoints considered in the 35 km study area there are 8 viewpoints located within Perth and Kinross. They included the following:-
- Ben Vrackie (VP 31 at 28.9km away from the windfarm)
 - Birnam Hill (VP 30 at 29.4km from the windfarm)
 - Burrelton (VP 28 at 23.5km from the windfarm)
 - Coupar Angus (VP 27 at 18.4km from the windfarm)
 - Forest of Alyth/Cateran Trail (VP 15 at 14.5 km from the windfarm)
 - A93 (VP 29 at 13.1km from the windfarm)
 - Hill of Alyth (VP 14 at 8.6km from the windfarm)
 - Mount Blair (VP 16 at 7.6km from the windfarm)

Ben Vrakie – View point 31

- 50 Ben Vrackie is a popular summit due to its proximity to Pitlochry. The operational Drumderg windfarm is a focal point to the south with towers, hubs and blades visible.
- 51 Macritch arrays appear as two separate windfarms. The southern array is predominantly screened by landform from this viewpoint, although turbine 1 is prominent. The northern array consisting of seven turbines is more visible from this viewpoint. In the centre of this group, turbines overlap (13 and 14 centre left, 12 and 11 also overlap centre right). Turbine 15 appears prominent in the northern array due to the tower of this turbine being visible.
- 52 Cumulatively Macritch would be seen as separate to Drumderg and Tullymurdoch (the windfarm baseline) extending windfarm development north-eastwards. This creates a windfarm landscape to the south east of Ben Vrakie. If the Saddle Hill application is approved this would reduce the gap between Macritch and the windfarm baseline and exacerbate the cumulative issue further, as would the approval of Dulater Hill windfarm.

Birnam Hill – View point 30

- 53 Birnam Hill (the King's Seat), sits on the edge of the Highland Boundary Fault line and is an iconic view point from the NSA's west boundary. The hill can be climbed using a circular route which results in walkers experiencing a series of different aspects of the transition from lowlands to Highlands. To the north-west Griffin, Calliacher (both operational) and Calliacher North (recently approved at appeal) would be visible. Drumderg windfarm is evident in views eastwards with turbine towers, hubs and blades visible.

- 54 Tips of Macritch's north array are just visible (turbines 16 and 15) to the north of Drumderg. The Macritch south array extends turbines to the south of Drumderg. The closest turbines to Drumderg are partially shielded by topography with tips and some hubs being visible. Turbines 1, 17 and 18 appear closest to Strathmore and are more prominent with turbine towers, hubs and tips visible. Cumulatively Macritch creates a confusing windfarm image and doubles the size of Drumderg in this view.
- 55 The cumulative impact would be increased by the presence of the approved schemes at Tullymurdoch and the Corb which would create one continuous mass of turbines. When the Saddlehill application is added to operational and approved baseline there would be a further thickening of turbines adding to the mass of turbines and exacerbate the confusion of wind energy development in this locale. Should Dulater be approved this would further complicate the windfarm image.

Burrelton – View point 28

- 56 Drumderg with Mount Blair behind forms one of the main focal points along the Highland Boundary Fault Line (HBF) from Strathmore as depicted by this viewpoint. Macritch predominantly sits behind the HBF. The tips of turbines 18 and 1 are visible, with turbine 1 more prominent.
- 57 Cumulatively this creates another focal point and extends windfarm development further eastwards.

Coupar Angus – View point 27

- 58 The tip of one Macritch turbine is visible, negligible impact.

Forest of Alyth/ CATERAN Trail – View point 15

- 59 This represents views for walkers from a section of the CATERAN Trail. Drumderg forms the main focal point in easterly view with turbines relating to the underlying rounded topography of the Drumderg site. Three turbines from the southern array of Macritch would be visible. Turbine number 1 is the most prominent with partial tower, hub and blade visible. The prominence of turbine 17 and 18 are reduced behind landform.
- 60 Macritch would sit in the gap between Drumderg and Tullymurdoch and appear separate from both these schemes. If Saddlehill windfarm is approved this would result in one continued mass of turbines at odds with the composition of each scheme. The cumulative impact would be further complicated by Welton of Creuchies (approved) that would be located to the right of and clearly separate from Tullymurdoch.

A93 – View point 29

- 61 This viewpoint represents views from road users on the A93 tourist route. Tips of Macritch turbines 1 and 18 are just visible. Not considered to have a visual impact.

Hill of Alyth – View point 14

- 62 This represents a popular local viewpoint close to Alyth and on the southern section of the Catheran Trail.
- 63 Drumderg is prominent in northwest view. Welton of Creuchies has a simple composition that relate to one another in this view. Tullymurdoch, once built, will have different turbine spacing, partially overlapping and extending Drumderg eastwards. Saddlehill would sit behind the ridgeline of Balduff Hill but extend the mass of Drumderg and Tullymurdoch further east.
- 64 Macritch would be seen as a separate windfarm creating a new focal point to the north east creating a significant cumulative impact.

Mount Blair – View point 16

- 65 Mount Blair is a popular summit used by walkers and is around 8km to nearest Macritch turbine.
- 66 Macritch reads as two separate schemes from this viewpoint. Turbines at the edges of the northern array are well spaced. While the southern array is made up of a series of turbine groups dispersed by awkward gaps. The windfarm does not appear coherent in this view due to the variety of turbine groups and spacing. A significant visual impact occurs from this viewpoint.
- 67 From this viewpoint Drumderg, Welton of Creuchies, Tullymurdoch and Saddlehill would be visible in southern views. Dulater if approved would appear clearly separate to the south west. Macritch would add wind turbines to eastern views which are currently free from windfarm development. Cumulatively the addition of Macritch above the baseline would create a windfarm landscape. A significant cumulative impact occurs.
- 68 Overall the proposed Macritch scheme would have a visual impact on popular summits that are frequented by recreational users the Hill of Alyth and Mount Blair, whilst an adverse cumulative impact would occur from Ben Vrackie, Birnam Hill, Hill of Alyth and Mount Blair. In light of this the scheme does not accord with Policy ER1A (a) and ER6 (b) of the LDP due to the individual and cumulative effect on visual integrity.

Carbon Reduction, Renewable Energy Targets and Socio-economics

- 69 It is acknowledged that this proposal would make a contribution to the Scottish Governments target of 100% electricity generation from renewable energy resources by 2020 as well as contributing to the reduction of greenhouse gas emissions in line with the commitment to reduce emissions by 42% by 2020 and 80% by 2050 targets as set out by the Scottish Government. With regards

to the Development Plan it would assist with one of the aims of TAYplan Policy 6 which seeks to deliver a low/zero carbon future for the region through a reduction in fossil fuels and LDP Policy ER1A (b) which seeks proposals to contribute to meet carbon reduction targets.

- 70 The economic benefits associated with wind farms are detailed in the applicant's submission. It is accepted that a development or construction project of this scale is likely to represent an economic opportunity to the local and regional economy as it will offer potential business opportunities for contractors through construction, delivery and maintenance, together with indirect expenditure through local shops, services etc.
- 71 Securing such benefits can be recognised as consistent with key Government and Development Plan objectives for the Scottish economy. However, those same objectives indicate that achieving *sustainable economic growth* in Scotland requires a planning system that can deliver growth enhancing activities in a manner which protects and enhances the quality of the natural and built environment as an asset for that growth. Environmental protection can therefore be seen as a key measure of *sustainable economic growth*.
- 72 Taking this into account benefits have to be balanced against the potential significant adverse effects on local environmental quality. In this case the visual impacts that occur individually and cumulatively within Perth and Kinross are considered sufficient enough to warrant an objection from the Council as Planning Authority.

CONCLUSION AND REASONS FOR RECOMMENDATION

- 73 The assessment above has taken account of the development plan and where necessary provided weight to material considerations. This includes information provided in the ES, comments received from internal consultees along with representations made to the Energy Consents Unit.
- 74 It is acknowledged that the proposal would make a contribution to the provision of energy from renewable resources, with a consequential reduction in CO2 emissions. An element of economic benefit during construction, operation and decommissioning would occur but this would have to be offset against the presence of the windfarm. In this case the visual impacts that occur within the administrative area of Perth and Kinross on its own and cumulatively are considered sufficient enough to warrant an objection to the proposal. It is therefore recommended that Perth and Kinross Council raise an objection.

RECOMMENDATION

- 75 It is requested that Members of the Committee support a recommendation of objection to the proposed Macritch Wind Farm on land at Black Hill/Saddlehill, Glen Isla, Angus.
- 76 The consequence of a Council objection is that the proposal would be subject to a Public Local Inquiry.

A Object for the following reasons

- 1 The location, dominance, scale and layout of the proposed wind farm on its own would result in unacceptable visual impacts. Accordingly the proposal is contrary to Policies ER1A (a) and ER6 (b) of the Perth and Kinross Local Development Plan 2014.
- 2 The proposal by virtue of the location, prominence, scale and layout of the proposed wind farm and its relationship to other wind turbine developments in the area would give rise to unacceptable cumulative visual impacts. Accordingly the application is contrary to Policies ER1A (a) and ER6 (b) of the Perth and Kinross Local Development Plan 2014.

Background Papers: None. It should be noted that representations on this application are submitted directly to the Energy Consents Unit of the Scottish Government.

Contact Officer: John Russell – Ext 75346
Date: 25 May 2015

NICK BRIAN
DEVELOPMENT QUALITY MANAGER

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