

CERES AND DISTRICT ENVIRONMENT AND AMENITY PROTECTION GROUP

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Mr Alastair Hamilton
Fife Council
Environment and Development Services
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5th March 2008

Dear Mr Hamilton

**Proposed Wind Farm at Gathercauld, Ceres
Ref : 07/01813/EEIA**

You will be delighted that Fife Council has been successful in defending their decision to refuse the Rossie application against EnergieKontor's ill judged appeal and with the speed with which the reporter has reached his decision which is widely welcomed.

We have had the opportunity to read the Reporter's decision letter which confirms that the proposal was in conflict with the Development Plan and that issues on landscape and noise had not been satisfactorily addressed.

We are also reassured that the while reporter accepted that SNH had not objected they had raised concerns that required to be addressed. These SNH concerns, the evidence of the Fife Council landscape witness Councillor Lothian and the evidence of Geoffrey Sinclair on behalf of ALE were given weight by the Reporter and not out weighed by the evidence of the appellants.

The applicant for the wind farm at Gathercauld chose not to ask Fife Council for a scoping opinion. They rested that decision on the basis of the broad similarities they saw between the site at Gathercauld and that at Auchtermuchty and you accepted that position.

We find the appeal decision at Rossie endorses our planning assessment of the proposal at Gathercauld. In particular the weight attached to the Development Plan (Structure Plan policies R7 and N1 and Local Plan policy COU19). There are many similarities between the Rossie and Gathercauld proposals which I would wish to draw to your attention by way of highlighting key assessments made by the Reporter.

Dealing firstly with landscape and visual impacts it is of note that the Reporter found that the Fife Landscape Character Assessment "**lends little support to the appeal proposal.**" We would suggest that the same conclusion can be reached with respect to the Gathercauld proposal with the landscape character assessment having set down clear recommendations regarding wind farm proposals. Furthermore, the Reporter states that the landscape character assessment "**states (at page 156) that the strong relationship between many of Fife's settlements and their landscape setting is a major contribution not only to the landscape character but also to the amenity value of the built up areas and the countryside around the towns. Public views into and out of settlements are stated to be an important part of every day life. It suggests that Auchtermuchty, amongst other settlements, could benefit from the preparation of a detailed landscape plan. As far as I am aware, no such plan has been prepared.**

However I recognise the importance of the town's landscape setting. As discussed below, I consider that the proposed turbines would have a significant effect on the setting of Auchtermuchty." He concludes that "the proposed turbines would have a major impact on the setting of the conservation area, and of the town generally." The impact on the setting of Ceres is a major component of our planning argument and is supported by our submitted photomontage visualisations.

It is interesting to note that the Reporter gave weight to the existence of the AGLV and the policy of the Structure Plan that seeks to protect the landscape. He states "**Applying the test in structure plan policy N1, I do not consider that the development would maintain the character of the landscape, and it would certainly not enhance it.**" We agree that in assessing the Gathercauld proposal the tests set out in the Development Plan must be applied. We believe that the Gathercauld, just like the Rossie proposal fails these tests to a significant degree.

In terms of the AGLV we find ourselves in a similar if somewhat stronger position here. SNH has not objected but directed Fife Council towards considering the very serious concerns they raise.

The Reporter acknowledged at Rossie "**that this is not an unblemished environment at present. The large, prominent Sterling warehouse to the south of Auchtermuchty detracts significantly from the local landscape. Of probably more relevance, an overhead 400 kV electricity line runs on a north-west to south-east alignment between the appeal site and Auchtermuchty.**" There are no such blemishes at Gathercauld which is a relatively pristine rural landscape with no development adversely influencing the landscape character. In other words the landscape at Gathercauld is in a more sensitive part of the AGLV and so is even more sensitive to change than that at Rossie.

It is of note that the Reporter gave weight to impact the proposal would have on residential and visual amenity up to 3 km from the site. He states "**The appellant's residential receptors' survey established that of the 1296 dwellings within a 3 km radius of the turbines, significant effects might be experienced by up to 481 dwellings. Of these, 201 would experience open, unrestricted views.**" The applicant has not prepared such a survey for the Gathercauld proposal. The only relevant material we can see in the Environmental Statement for Gathercauld is at Appendix 5.3 "Effects on Representative Dwellings within 1.5 km". While comments describing the location and the perceived view to the wind farm are given in the table it does not give the scale of effect or degree of significance and this is a serious and unacceptable omission. Were this to be done at Gathercauld the 3km radius would take in the whole of Ceres and Bridgend, Pitscottie, New Gilston and Woodside and isolated dwellings in between.

In terms of the benefits a renewable energy proposal would bring the reporter noted that "**The SPP states (at paragraph 54) that consideration of the significance of any adverse impacts of a renewable generation proposal should have regard to the projected benefits of the proposal in terms of its contribution to the Scottish Government's targets for renewable energy. The installed capacity of the proposed turbines is 10 MW, and the appellant has estimated that the capacity factor would be about 31%. The contribution to renewable energy, while worthwhile, would be fairly modest, and this has to be balanced alongside the significant impacts on landscape, visual amenity and local communities.**"

At Gathercauld the installed capacity would be 6.5MW which would mean, given the same capacity factor as Rossie, a contribution to renewable energy of about 2 MW. We would expect it to be less than that given the height of the turbines and the less windy part of the area the turbines are applied for. Any wind measurements calculated from the Met Mast for the predicted output at Gathercauld would need to be adjusted downwards as the met mast is not on the site of the wind farm and is on a more elevated location.

The applicant makes great play on the fact that the Gathercauld proposal is within a broad area of search. We are heartened by the Reporter's assessment and weight to be attached to such situations – **“with respect to the development plan, the search areas identified in the structure plan cover a large part of Fife, and do not exclude settlements. I therefore attach only limited weight to the fact that the site lies within such an area. Furthermore, as noted above, I consider that the proposal would have significant adverse landscape and visual impacts, significant adverse impacts on Auchtermuchty and its residents, and a major adverse impact on Auchtermuchty Common. I conclude, in particular, that it would be contrary to structure plan policy R7 and local plan policy COU19. It would also be contrary to structure plan policy N1. Overall, it would not accord with the development plan.”**

A great many local people have taken the time to object to the Gathercauld proposal on firm planning policy grounds and we note the weight the Reporter attaches to a similar position at Rossie. He states **“More than 400 objections were received, and third parties played an important role at the inquiry. Most of the issues raised, which I have already addressed, were relevant planning matters, and I attach significant weight to those expressions of local concern.”**

There are also important objections to the Gathercauld application from bodies like The National Trust for Scotland, The Association for the Protection of Rural Scotland, The Scottish Ramblers, Protect Rural East Fife and five community councils. All have objected on planning and landscape grounds as well as other issues.

It was also interesting to note that the Reporter found comfort in SPP 6 in support of his decision that the turbines were too close to a settlement He states **“Scottish Ministers would support a 2 km separation distance between turbines and the edges of towns and villages, but that within that distance proposals should continue to be judged on a case-by-case basis. This reinforces my general view that the proposed turbines in this case would be too close to Auchtermuchty.”** Similarly he acknowledged the Council's emerging Supplementary Planning Guidance when he states **“the council considers that the minimum stand-off distance between commercial scale wind turbines and a neighbouring property should be 1.5 km (with the actual distance evaluated for each proposed development etc). By contrast, in this case, there would be turbines within about 600 - 700m of several isolated properties, and within about 800m of the eastern edge of Auchtermuchty.”** In terms of proximity to residential property a very similar situation prevails at Gathercauld to that at Rossie.

All in all the grounds for refusal for Gathercauld are now quite clear being broadly the same as for Rossie.

Yours sincerely
Graham Lang

Ceres and District
and Amenity Protection Group

Cc Garry Dimeck, Keith Winter, Jim Birrell, Councillor Andrew Arbuckle