



# Scotland Against Spin

The alliance for all opposed to National Wind Energy Policy

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Dear Sirs,

## **Consultation Response to Review to SNH Visual Representation of Wind Farms**

A representative of SAS attended the SNH workshop on 17<sup>th</sup> June at Battleby and the site visit to view Drumderg Wind Farm from a viewpoint above Bridge of Cally.

We have read the consultation draft. As the national organisation representative of a section of receptors that could be described as interested third parties and members of the public, we make the following comments by way of a preamble. We answer the consultation document questions we feel qualified to at the end of the document.

Text taken from the consultation documents is in italics.

### ***“Production of visualisations in future***

*The previous version of this guidance made a series of recommendations and provided minimum requirements. It is intended that the final version of this guidance will be more prescriptive, especially on the size and number of images to be presented and the camera / lens to be used. All wind farm visualisations will be expected to conform to the standard requirements. This should increase confidence in the images and reduce the scope for confusion in the future. It should also lead to a consistent approach across Planning Authorities. Visualisations which do not conform to the standards will not be accepted by SNH”.*

This is a positive position statement but stating that “Visualisations which do not conform to the standards will not be accepted by SNH” is in itself not sufficient. Planning Authorities need to adopt the line that if SNH do not accept visualisations then the application stops where it is until compliant visualisations are submitted and approved by SNH. If applicants do not comply in a set time their application should be deemed refused.

The Highland Council approach, where they have clearly set out standards that applicants must adhere to, in order to allow the proposal to proceed to the planning process gives absolute clarity on what is required, and SNH guidance should do nothing less.

This discipline would reduce the time taken to assess applications and be helpful to both applicants, statutory consultees, planning authorities, third parties and members of the public.

We understand that visual impact is a separate strand from landscape impact and visual impact on residential amenity is perhaps the biggest single issue that interests individuals and communities when considering the siting of a wind farm or wind turbine development. This applies to all developments irrespective of scale as far as the public is concerned. For this reason it is vital that visualisations are representative of the proposed development.

Since importance is placed in the document on visual impact on local receptors, it would be sensible to include local receptors in the consideration of viewpoint selection. At present viewpoints are selected through discussion between the developer, their consultant on LVIA, SNH and the Planning Authority.

We do understand that this may not be possible at the early stages of designing a proposal but once the final iteration is selected it could be possible. We have not heard of any instances where a community council or other local community group has been asked to contribute to the process and their local knowledge and interest should be recognised. Of course developers bringing forward a proposal would need to be transparent in numbers and location of turbines to make community input worthwhile.

The consultation document refers to visualisations and photomontages and to a lay person these are considered to be one and the same. There is no glossary to help establish what the difference is and it would be helpful to have a simple explanation.

If one word will do for both that would be better still.

### **Small Scale Wind Farms and Single Turbines**

To consider a less exacting standard for visualisations for small developments or the feed-in tariff inspired proposals is not acceptable. If a proposal is to enter and progress through the planning system it should meet standards that stand up to scrutiny and we hope the revised guidance will provide a simple benchmark to achieve that required standard.

We have looked at dozens of small scale and single turbines proposals that fail the visualisation test.

In Fife Council's "Supplementary Planning Guidance - Wind Energy" adopted in June 2011 there is the following advice.

*"Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and IEMA, 2002) and best practice guidance published by SNH should be adhered to. For turbines over 15m, ZTV diagrams will usually be expected for up to 15km from the site. For turbines over 50m a zone of 30km away should be provided in a ZTV diagram. Wireline drawings and/or photomontages from key locations are also likely to be needed, the number depending on the size of the turbine(s) and the number of important views that maybe affected."*

That is succinct and no one with a wind turbine development they wish to progress can be in any doubt as to what is required and yet even with this advice applications are lodged with visualisations that claim to follow SNH guidance and look like this.



In this case the SNH response to the planning authority consultation was

*“Given the size of the proposal, in line with our current development management guidance we would not expect to be consulted on a proposal of this scale, unless the development was thought to impact on a Natura 2000 site.”*

This leads to delays if the officer asks for compliant visualisations or, as happened in this case to assist the applicant, attempts to use the images in determining the application. This is not to the credit of the planning service and certainly not in the public interest. SNH should look at all applications for all scales of turbines and advise the Planning Authority if the visualisations meet the required criteria or not. At that stage the applicant can be advised accordingly. This will concentrate minds and dilute the commonly held opinion that the developers lead the planning system.

We understand from SNH that the time-line for revised guidance for this range will not be for some unspecified time after the introduction, in late 2013 early 2014, of the guidance that is the subject of this present consultation.

Given the time it has taken since the Minister asked for this work to be done a further delay to include small scale and single turbines in further guidance which in essence should be the same such a time lag is unacceptable and the revised guidance should address this at the same time.

### **Responses to consultation Questions**

**Question 2:** *This table has been adapted to reflect the use of increasingly large turbines. Do you agree with the distances proposed?*

Yes.

**Question 4:** *The table above refers to examples of viewpoints that should be chosen. Are any aspects missing?*

While there is mention of the viewer type there is no view type that seems to fit with “those at home”. Where significant effects are to be assessed this category should be included with one or more dedicated viewpoints representative of the impact on residential amenity.

**Question 5:** *The number of viewpoints per assessment is commonly 10-25 for wind farm proposals in Scotland. Do you think that number is reasonable? If not, how many viewpoints would you expect in an assessment? Should there be a cap?*

This depends on the scale and location of the development and there should be no cap. We firmly believe that even after the environmental statement is prepared additional visualisations should be provided at the reasonable request of members of the public with a clear interest in the visual impact of the proposal. Developers are often asked to do this but always decline. There should be an obligation to meet reasonable third party requirements.

**Question 6:** *Given the larger size of images proposed below (260mm in height) and the increased focal length, do you agree that the exact viewing distance is no longer important?*

As a lay observer at the workshop we formed the view that the viewing distance was not important with the proposed methodology.

**Question 7:** *Do you think that the above measures will make visualisations sufficiently accessible to the public?*

Yes with the exception of 1 which is unaffordable.

**Question 8:** *The baseline panorama and wireline can either be presented on a single A1 width sheet, or on several A3 pages – do you have a preference?*

A3 is a manageable size to take on a visit to a viewpoint.

**Question 9:** *The original guidance recommended photomontages are used only for viewpoints within 15km of a wind farm. The proposed revised guidance suggests 20km because of the increase in turbine heights. Do you agree with this approach?*

We agree.

**Question 10:** *The two options above (A and B) result in the same panoramic image, they differ only in the lens used to produce this. Either is acceptable for landscape and visual impact assessment. However, do you have a preference for the use of a 50mm lens (with stitching) or a 35mm lens to produce the panorama required?*

We have no preference if the result is the same.

**Question 11:** *Do you think that this image size (A4 in height, A1 in length) is practical – to be used in the office and the field?*

There may be some use for the larger image at planning committees because the present projection of images at planning meetings we have attended is generally completely unsatisfactory. Larger paper copies displayed for the use of the determining committee would be much better.

**Question 13:** *Do you think that aerial views for large offshore wind farms could be helpful?*

Aerial views of on-shore wind farms would be helpful in assessing context and cumulative impact with on and off-shore proposals

**Question 14:** *Are there any other factors to take in to account for offshore wind farms? Is the same focal length of 75mm appropriate for photomontage?*

Why are we now discussing photomontage rather than visualisations as earlier in the questionnaire. The 75 mm focal length is appropriate.

**Question 15:** *Do you think a photomontage is required from every viewpoint (within 20km), or will wireframes alone from some locations be sufficient?*

Where the viewpoint is inaccessible there should always be an accompanying visualisation/photomontage. For members of the public wireframes are largely ignored as it is the visualisation they want to see how it compares with their experience of the area.

**Question 16:** *Presenting sequential cumulative impacts as ‘bar charts’ tallying with the relevant coloured sections of roads has been found useful. Do you agree or do you have alternative suggestions?*

Not suitable for members of the public or indeed Local Planning Authorities.

**Question 17:** *Do you think it is reasonable to expect members of the public to visit local libraries, Council offices or public exhibitions to view images correctly (as is current practice)?*

Yes if paper copies are available.

**Question 18:** *If viewed on screen, do you think it is important to provide an accurate representation of the wind farm, or is a reasonable representation sufficient?*

If this is on a home computer screen or on the screen at a public exhibition or at meetings of the determining authority or a reporter determining an appeal a key information source is the visualisation/photomontage representations so this is a strange question to ask. They must be accurate.

**Question 19:** *Do you think an interactive viewer to view images on screen is helpful? Should developers be required to produce images in this way, or is this disproportionate in terms of time and cost?*

We do not believe that the use of software to produce “reassuring” impressions on screen of what the development might look like from Mrs Smith’s kitchen window are helpful other than flattering to deceive the customer into thinking the impact will be less than she might think it will be.

It is a sales gimmick and unless it can be verified that it is anything else it should be discouraged.

This completes our response to the SNH Consultation on Visual Representation of Wind Farms.

Yours faithfully,

Graham Lang  
Scotland Against Spin