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**MOORSYDE WIND FARM
PLANNING AND
VISUAL IMPACT APPRAISAL**



**BERWICK-UPON-TWEED
BOROUGH COUNCIL**

REVISED DRAFT

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1.0 INTRODUCTION

Ferguson McIlveen LLP was appointed in June 2006 to provide an independent assessment of a series of planning applications for wind farms proposals within Berwick upon Tweed Borough. To date, three applications have been received by the local planning authority (LPA); Moorsyde Wind Farm, Barmoor Wind Farm and, most recently Wandylaw Wind Farm.

The Moorsyde and Barmoor sites are located approximately 10-12km south west of Berwick and would comprise 10 and 9 turbines respectively. It is important as these two sites are very close in proximity that any cumulative effect is taken into consideration.

This draft report focuses on the Moorsyde Wind Farm proposal which was submitted to the LPA at the end of 2004. The report provides a dual role. Firstly it assesses the proposed wind farm against both extant planning policies and potential emerging policy. Secondly it provides an audit of the previously documented visual impacts of the wind farm, and suggests, where appropriate, further information might required to enable a robust decision to be made on the application.

An Environmental Impact Statement (EIS) was submitted with the planning application but was not assessed as part of this report as the client had previously commissioned a review by another consultancy.

2.0 PLANNING CONTEXT

2.1 Policy Context

In accordance with Section 54 (A) of the Town and Country Planning Act 1990, planning applications must be determined in accordance with the provision of the Development Plan, unless material considerations indicate otherwise. Following amendments made by the Planning and Compulsory Purchase Act 2004 (the 2004 Act) a Development Plan, in generic terms, now comprises the relevant Regional Spatial Strategy (RSS) and Development Plan Documents (DPDs) contained in the Local Development Framework (LDF). Until new DPDs have been prepared the existing Structure Plan and Local Plan continue to form part of the Development Plan.

Accordingly, the adopted Development Plan applicable for Berwick-upon-Tweed comprises the Northumberland County and National Park Joint Structure Plan (adopted 2005) and the Berwick-upon-Tweed Borough Local Plan (adopted April 1999), read together with the current Regional Spatial Strategy (RSS) to 2016 and the Regional Planning Guidance for the North East (RPG1) which was published in 2002. It became RSS for the region until its replacement by emerging RSS.

On 28th September 2004, the North East Regional Planning Guidance (RPG1) became the Regional Spatial Strategy (RSS) and as such forms part of the development plan. The RPG sets out a strategy and vision for land use planning in the region over the next 15 to 20 years. This policy context provides the framework upon which Structure Plan and subsequently Local Plans are developed.

In the context of this report, it is important to note the approach to renewable energy adopted by RSS. In 2000 the Government Office for the North East (GONE) was asked by DTI and DETR to commission an independent study examining the potential of, and recommending targets for, the development of renewable energy in the North East. The findings of the report would inform both RPG1 and the Regional Sustainable Development Framework. The report found that the region has significant potential for renewable energy, with wind energy being the major resource option.

RPG1 advises that the region should set a renewable energy target. The Consultants (Chris Blandford Associates) employed to assess the region's potential have suggested a target range between 240MW and 416 MW (excluding energy from waste). RPG1 considers a regional target should be both challenging and aspirational towards the upper end of the target range suggested by the consultants.

2.2 Policy Review

Having reviewed the planning statement accompanying the application, this report looks at each of the tiers of planning policy and identifies any omissions that could be considered material to the determination of the proposed development.

Importantly, when the Moorsyde planning application was submitted in November 2004, the 2005 Northumberland County and National Park Joint Structure Plan had not been formally adopted. As a result, the applicant's submission was based upon a review of policies from both the previous Northumberland Structure Plan from 1996 and the Northumberland County and National Park Joint Structure Plan First Alteration including Schedule of Proposed Modifications following the Examination in Public (2004), as well as provisions within the Berwick upon Tweed Borough Local Plan.

Another, albeit relatively minor, point is that given the timing of the applicant's Planning Statement relative to the emerging RSS, the references to RPG1 (contained within paras 6.16 – 6.18) should properly be included Section 5 (Policy Considerations).

2.2 Relevant RSS Policies (as contained in RPG1 Nov 2002)

The only policy cited in the applicant's submission is Policy EN2 – Renewable Energy, which requires that development plans and other strategies should, inter alia:

- identify "Strategic Wind Resource Areas" (SWRAs) where appropriate to identify the general locations where positive consideration will, in principle, be given to major wind energy developments, (including offshore locations). Areas of Search should also be identified for hydro-generation and other renewable technologies;
- prepare formal assessments of the capacity of landscapes within the plan area to accommodate different types and scale of scheme;
- give careful consideration to the appropriate type and scale of renewable energy scheme which could be located in, or visible from, the more sensitive locations of the Northumberland National Park, the North Northumberland Coast Area of Outstanding Natural Beauty and North Pennines Area of Outstanding Natural Beauty.

It should be noted that whilst the Structure Plan does make provision for what it terms 'Wind Resource Areas' (policies M4 and M5) the Local Plan is silent on this point as it pre-dates RSS.

Nonetheless, the focus within the applicant's Planning Statement upon only policy EN2 should not have obscured the need to take into account of other objectives for the environment, and environmental policies within RSS. For completeness, these are cited below, although it is considered that there is no perceived weight in these additional policies that would count against the compliance in principle with the concept of a wind farm in the proposed location.

Objectives for the Environment

- to integrate environmental considerations into decision making at every level, ensuring that plans and development options are assessed for potential positive contributions as well as negative effects on the environment;
- to complement other measures aimed at urban and rural renaissance through protecting and improving the environment;
- to ensure that provision for development is balanced with the need to protect the region's natural and man-made assets. Unnecessary loss of, or damage to, these assets should be avoided; and
- to ensure that, as far as possible, development does not cause significant environmental harm; where such development is to be allowed, mitigation and compensation measures should be fully employed.

ENV5 – Biodiversity

Development Plans and other strategies should:

- aim to maintain and increase biodiversity within the region, and recognise the nature conservation value of non-designated habitats;
- contain policies against which development proposals which will affect sites of nature conservation importance and protected species can be assessed;
- promote relevant local Biodiversity Action Plans (BAPs), both in protecting the nature conservation value of designated habitats and the wider countryside, and in assessing the

- possible contribution of development and regeneration proposals to enhancing biodiversity (and vice versa); and
- consider adopting local BAPs as Supplementary Planning Guidance.

ENV6 – Landscape Character

Development Plans and other strategies should:

- seek to maintain and enhance the quality, diversity and local distinctiveness of landscape character throughout the North East; and
- have regard to the Countryside Agency's landscape character approach.

ENV8 – Local Designations

Development Plans and other strategies should:

- review existing landscape designations, with regard to the Landscape Character approach, co-operating with other planning authorities and agencies, where necessary, to identify and protect areas of particular character; and
- not restrict development unreasonably in these areas, but aim to ensure that where development is permitted, its final form does not detract from the character and local distinctiveness of the landscape.

ENV9 – Tranquil Areas

Development Plans and other strategies should:

- identify those areas where the maintenance of tranquillity is both important and practical; and
- protect and, where appropriate, increase tranquil areas throughout the region when formulating policies for land use, transport and traffic management.

ENV11 – Best and Most Versatile Agricultural Land

Development Plans and other strategies should set out the appropriate level of protection to be afforded to high quality agricultural land in relation to other considerations such as landscape character, biodiversity and sustainability.

ENV12 – Rural Diversification

Development Plans and other strategies should balance the need for economic diversification and business growth in rural areas with the need to protect the environment.

ENV14 – Historic Landscapes

Development Plans and other strategies should:

- seek to conserve the historic landscapes of the region;
- seek to preserve, in situ, scheduled archaeological sites of national importance and, where appropriate, other archaeological remains of more than local importance; and
- identify and give an appropriate degree of protection to historic parks and gardens, battlefields, ancient field systems, green lanes trackways, industrial monuments and other non-scheduled archaeological sites, which reflects their national or regional importance.

2.3 RSS for the North East Submission Draft (June 2005)

This document post-dated the submission of the Moorsyde Wind Farm application, but needs now to be taken into account as a material consideration in the determination of the application. The section on 'Renewable Energy Generation' contains a criteria-based approach to assessing proposals. The following extracts are relevant:

POLICY 40 – RENEWABLE ENERGY GENERATION

“Strategies, plans and programmes should:

- a) facilitate the generation of at least 10% of the region’s consumption of electricity from renewable sources within the region by 2010 (454 MW minimum installed capacity);*
- b) aspire to further increase renewable electricity generation to achieve 20% of regional consumption by 2020;*
- c) require new developments, particularly major retail, commercial and residential, to have embedded within them a minimum of 10% energy supply from renewable sources; and*
- d) facilitate the achievement of the following minimum sub regional targets to 2010:*
 - Northumberland 212MW*
 - Durham 82MW*
 - Tyne & Wear 22MW*
 - Tees Valley 138MW*
 - Total 454MW*

POLICY 41 – PLANNING FOR RENEWABLES

Strategies, plans and programmes should support and encourage renewable energy proposals and identify renewable resource areas. In assessing proposals for renewable energy development the following criteria should be considered:

- a) wider environmental, economic and social benefits;*
- b) anticipated effects resulting from development construction and operation such as air quality, atmospheric emissions, noise, odour, water pollution and the disposal of waste;*
- c) acceptability of the location and the scale of the proposal and its visual impact in relation to the character and sensitivity of the surrounding landscape;*
- d) effect on the region’s World Heritage Sites and other national and internationally designated sites, areas or their settings;*
- e) effect of development on nature conservation features, biodiversity and geodiversity, including sites, habitats and species;*
- f) maintenance of the openness of the region’s Green Belt;*
- g) accessibility by road and public transport;*
- h) effect on agriculture and other land based industries;*
- i) visual impact of new grid connection lines;*
- j) cumulative impact of the development in relation to other similar developments; and*
- k) proximity to the renewable fuel source such as wood-fuel biomass processing plants within or close to the region’s major woodlands and forests.*

“Environment Map 1 and policy 42 indicate the broad areas with the least constraints identified by the RRES, which offer the greatest potential to accommodate onshore wind developments. This does not, however, remove the need to consider the potential for onshore wind developments in other parts of the region. Proposals for onshore wind development within and outside these broad areas should be assessed against the criteria contained within policy 41. Medium scale wind energy development is broadly defined as up to 20-25 turbines, with small scale up to five turbines, although this may change dependent on advances in technology. “(para 3.141 RSS Submission Draft June 2005).

POLICY 42 – ONSHORE WIND DEVELOPMENT

“Strategies, plans and programmes should provide a positive policy framework to facilitate onshore wind development within the following broad areas of least constraint for wind energy developments:

a) Kielder Forest has the potential to become a Strategic Renewables Resource Area, including large scale wind energy development;

b) the following areas have potential for medium scale development:

- South and West Berwick upon Tweed*
- North/ South Charlton*
- Knowesgate*
- Harwood Forest*
- Northern Coalfield south of Druridge Bay*
- Kiln Pit Hill*
- North Durham Upland Coalfield*
- South Durham Upland Coalfield*
- Tees Plain*
- Teesside/ Tees Estuary*

Small wind farms in urban areas and on the urban rural fringe should also be supported, particularly within the following areas:

- Sunderland;*
- South Tyneside; and*
- Tees Valley.*

The broad locations of these areas should be identified within Local Development Frameworks. Other areas will be judged subject to assessments of local impact.”

2.4 Northumberland County and National Park Joint Structure Plan (2005)

The applicant’s Planning Statement is silent with regard to the following Landscape policy which is considered material to determination of any wind farm proposal.

Policy L12

“The development of the best and most versatile agricultural land will only be permitted where it can be demonstrated that, in accordance with Policy S11, the proposal cannot be accommodated on previously developed land or within existing developed areas. Where development is considered to be appropriate, it should, as far as possible, use lower grades of land unless other sustainability considerations indicate otherwise.”

2.5 Berwick-upon-Tweed Borough Local Plan (1999)

The applicant’s Planning Statement is silent with regard to the following general and specific policies which are considered material to determination of any wind farm proposal.

Policy F1

“Having regard to the provisions for development made in the Plan, and of Policy F31, primary importance will be given to sustaining and enhancing the Borough’s environmental wealth, including its landscape and coast, its native biodiversity and its human heritage.”

Policy F31

"In applying the above policies, in particular Policy F1, weight will be given to the degree to which proposals are foreseen to enhance the quality of life of communities in the plan area, or to complement the range of social or economic functions which any of them performs."

Policy F12

"Trees or woodlands which would be adversely affected by development will, in appropriate circumstances, be protected by the making of a Tree Preservation Order or, if planning permission for development is granted, by imposing appropriate conditions to preserve and protect trees within the vicinity of the development."

Policy F15

"The best and most versatile agricultural land will be safeguarded. Development for non-agricultural purposes will not be permitted on land in classification grades 1, 2 or 3a unless the Council has been satisfied that;

- i. no alternative site is available; and
- ii. the development will sustain and enhance the quality of life of communities and the social and economic activities undertaken therein, in accord with Policy F31.

"In considering proposals for the development of agricultural land, regard will be had to the effects of the proposed development on the operation of local agricultural interests. Where the release of agricultural land is permitted, the Council will seek its retention in agricultural use until it is required, and its release in phases where appropriate."

2.6 Summary of Planning Policy

Based upon an assessment of the planning context it is considered that, in principle, a proposal for a wind farm comprising 10 turbines could be sited within the subject area without prejudice to prevailing planning policies. Although some relevant policies within the planning framework have not been referenced in the applicant's submission, and emerging advice in the RSS Submission Draft post-dated the Moorsyde application, it is considered that this is not prejudicial to the proposal overall. The main thrust of planning policy is to support renewable energy and, further, to direct proposals for wind farms to the broad areas south and west of Berwick that include the land subject of the current Moorsyde proposal.

3.0 VISUAL IMPACT AUDIT

3.1 Introduction

The following provides a review of the Landscape and Visual Impact Assessment of Moorsyde Wind Farm (Chapter 10 of the Environmental Statement) incorporating findings of the Audit of Environmental Assessment by Ironside Farrar. Our comments are also based on our independent fieldwork assessment.

3.2 The Receiving Environment / Baseline Conditions

The findings of the Ironside Farrar audit in relation to the description of the Baseline Conditions are, in our opinion, correct. With regard to potential visual receptors, please refer to the Plate descriptions below for a detailed description of additional receptors we have identified to those described in the previous two reports.

3.3 Impact Assessment / Predicted Impacts

The findings of the Ironside Farrar audit in relation to the description of the Predicted Impacts are also, in our opinion, correct. Viewpoint selection for photomontage locations is, however, a critical aspect of the process of Visual Impact Assessment. Therefore a site visit was carried out by Ferguson McIlveen LLP to assess the viewpoints selected for the ES and, potentially, to identify additional/alternative locations for photomontages and impact description. Please refer to Photosheets 1-3 and the Plate descriptions below for recommendations on further potential investigations of the visual impact resulting from the development of Moorsyde Wind Farm.

Appendix J (Preliminary Assessment of Visual Receptors) of the Environmental Statement was used as a reference for locations where further visual investigation may be required. Areas described in the Statement as having *open views of major or moderate significance* were visited.

Plate 1:

- View southwest from the pub at West Allerdeen. The original ES does not contain a visualization of the proposed development from this viewpoint. However a photomontage from a similar location was submitted with the Addendum report (Viewpoint 5a ANCROFT – Figure 7).
- This is an important visual receptor, as there are a number of houses in this area which will have open views of the proposed wind farm. The pub has outdoor seating, so customers will also have open views of the wind farm.
- Critically, the Cheviot Hills are visible in the background in views towards the proposed wind farm site from this location. A photomontage from this location would therefore demonstrate the potential visual impact on long distance views of the hills from this viewing location.
- A photomontage submitted with the Addendum report was taken from a location along the road between Ancroft Northmoor and Ancroft Southmoor. We would deem this an unsuitable location for a photomontage representing views from this area for the following reasons. The photo was taken from a location along the road, over 250m away from the closest buildings and it therefore does not represent a view the local residents would regularly experience. It was also taken from a relatively low elevation (approximately 65m

AoD - the location at West Allerdeen is approximately 80m AoD). Due to the low elevation and the direction of the view, the Cheviot Hills are not visible in this photomontage and the visual impact on long distance views of these hills is therefore are not fully illustrated.

Plate 2:

- Similar location to 'Viewpoint 2 SALUTATION INN (Fig 10.8)' of original ES.
- The viewpoint is appropriate and it appears that the photomontage is correct.
- One of the notes underneath Fig 10.8 cannot be correct. The text claims that 12 hubs but only 9 blade tips are visible. This is impossible.

Plate 3:

- Similar location to 'Viewpoint 3 SHORESDEAN (Fig 10.9)' of original ES.
- The viewpoint is appropriate and it appears that the photomontage is correct.

Plate 4:

- View south from Shoreswood. This viewpoint is located halfway between viewpoint 2 and 3 of the original ES.
- This viewpoint shows a view of the proposed wind farm site from one of the closest settlements to the site. It is taken from a public road and there are a number of houses nearby. Photomontage viewpoints 2 and 3 from the original ES indicate adequately the nature of the visual impact on this area.

Plate 5:

- View from Grievestead. This viewpoint looks in a similar direction to viewpoint 1 of the original ES. The viewpoint indicated in Plate 5 is however located almost 2km closer to the site.
- The buildings at Grievestead are very close to some of the turbines. It may be important to show the visual impact caused by the wind farm on this location, as this is one of the closest settlements to the proposed wind farm.
- A photomontage from a similar location was submitted with the Addendum report (Viewpoint 4a DUDDO STONE CIRCLE – Figure 6). The photomontage appears to be correct. This viewpoint is however not as close to the nearest turbine as the viewpoint location at Grievestead and it may therefore still be of value to produce a photomontage.

Plate 6:

- Similar location to 'Viewpoint 1 GRINDON (Fig 10.7)' of original ES.
- The viewpoint is appropriate and it appears that the photomontage is correct.

Plate 7:

- View southeast from Ladykirk. The original ES did not have a similar viewpoint; however a photomontage from a similar location was submitted with the Addendum report (Viewpoint 6a LADYKIRK – Figure 8)

- Ladykirk is listed as having open views of the proposed wind farm in Appendix J of the original ES. The views are further listed as being of high sensitivity and major significance.
- Plate 7 indicates that the turbines would be distantly visible from a location within the village. This would be a suitable viewpoint location for the production of a photomontage.
- The photomontage submitted with the Addendum Report appears to be taken from the eastern edge of Ladykirk and therefore still close enough to the settlement to be representative. The photomontage appears to be correct.

Plate 8:

- View south from West Lodge. The original ES did not have a similar viewpoint.
- As with Plate 7, West Lodge (very close to West Longridge as described in Appendix J) is listed to have open views of the proposed wind farm in the Appendix J of the original ES. The views are further listed as being of high sensitivity and major significance.
- Plate 8 indicates that the turbines would be distantly visible from this location. This would be a suitable location for a photomontage, as it is taken within 5km of the wind farm site, where the visual impact can still be quite high. The Cheviot Hills are visible in the background of this view and a photomontage from this location could therefore be used to illustrate the potential visual impact on long distance views of the Cheviots. The ES did not include photomontages from this location.

Plate 9:

- View southeast from Hutton. The original ES did not have a similar viewpoint (Viewpoint 7 looks into a similar direction; it is however 4km further away).
- As with Plates 7 & 8, Hutton is listed to have open views of the proposed wind farm in Appendix J of the original ES. The views are further listed as being of high sensitivity and moderate significance.
- Plate 9 indicates that the turbines would be distantly visible from this location. This would be an appropriate place for a photomontage, as the viewpoint is within 8km of the wind farm site, where the visual impact can still be quite high. The ES did not include photomontages from this location.

Plate 10:

- Similar location to 'Viewpoint 7 CHIRNSIDE (Fig 10.13)' of original ES.
- The viewpoint is appropriate, however at a 12km distance, the visual impact is quite reduced and the photomontage photo would have to be taken on a very clear day in order to demonstrate how much of the 14 turbines would be visible.
- Due to the distance from the site and the low potential visual impact, it is not considered essential to produce a photomontage from this location.

Plate 11:

- View southeast from the viewpoint at the War Memorial at the western edge of Foulden. The original ES did not have a similar viewpoint.

- As with Plates 7, 8 & 9, Fouldon is listed to have open views of the proposed wind farm in the Appendix J of the original ES. The views are further listed as being of high sensitivity and moderate significance.
- Plate 11 indicates that the turbines would be distantly visible from this location on a clear day. This location is preferable to viewpoint 7 of the ES, as it is a public viewpoint and at a 10km distance, slightly closer to the site. The ES did not include photomontages from this location.

Plate 12:

- View southwest from the Camphill Viewpoint just west of the A1. This viewpoint is located approximately 1.75km further northeast than viewpoint 4 of the original ES.
- Due to the high elevation of this viewpoint the view towards the proposed wind farm site is much more open than in viewpoint 4 of the original ES.
- This is a very important viewpoint, as it is a public Viewpoint listed on the OS maps, and due to its proximity to the A1. There would be similar views along the more elevated part of the A1 in this area.
- The Cheviot Hills are visible in the background in views from this location and a photomontage from this location would therefore also demonstrate the potential visual impact on long distance views of the hills.

Plate 13:

- Similar location to 'Viewpoint 4 BERWICK BYPASS (Fig 10.10)' of original ES.
- This is an unsuitable viewpoint, as the picture was taken from a very low elevation along the A1. Neither the site lands nor the Cheviot Hills are visible in this view, whereas these would be visible from more elevated locations along the A1.
- A photomontage would be more appropriate taken from further north along the A1 or from the Camphill Viewpoint (see Plate 12) instead.

Plate 14:

- View southwest from a location nearby the school in Scremerston. The original ES did not have a similar viewpoint; however a photomontage from a location approximately 6km southeast was submitted with the Addendum report (Viewpoint 2a GOSWICK – Figure 4).
- As with Plates 7, 8, 9 & 11, Scremerston is listed to have open views of the proposed wind farm in Appendix J of the original ES. The views are further listed as being of high sensitivity and moderate significance.
- Plate 14 indicates that the tips of the turbines would be distantly visible from this location on a clear day. It is not obvious how much of the turbines will be visible from this location, due to local topography and vegetation blocking views into the wider landscape. Considering the large amount of receptors and relative proximity (i.e. 6.5km) to the site, it may be worth checking the exact extent of visibility by producing a photomontage from this location. The ES did not include photomontages from this location.
- Viewpoint 2a submitted with the Addendum Report was taken from a roughly similar direction and from a location within the AONB. It is however almost 10km away from the site and Goswick, from where the photomontage viewpoint is located, is a relatively small settlement with a relatively small number of receptor. The location in Scremerston should therefore be considered as an additional location for a photomontage.

Plate 15:

- View southwest from a location at the southern edge of Scremerston. The original ES did not have a similar viewpoint; however a photomontage from a location approximately 6km southeast was submitted with the Addendum report (Viewpoint 2a GOSWICK – Figure 4). This is a similar viewpoint to Plate 14 above.
- Refer to the descriptions of Plate 14 above. Please note that Plate 15 would be more suitable for a photomontage than Plate 14, as the wider landscape is slightly more visible. The ES did not include photomontages from this location.

Plate 16:

- Similar location to 'Viewpoint 9 HOLY ISLAND (Fig 10.15)' of original ES.
- The viewpoint is appropriate, however at 16.5km distance the visual impact is quite reduced and the photomontage photo would have to be taken on a very clear day in order to demonstrate how much of the 14 turbines would be visible.
- An additional photomontage from a similar location was submitted with the Addendum report (Viewpoint 1a BEAL – Figure 3). This photomontage appears to be a very good representative of the visual impact on views from the AONB.

Plate 17:

- Similar location to 'Viewpoint 5 BOWSDEN (Fig 10.11)' of original ES.
- The viewpoint is appropriate and it appears that the photomontage is correct.

3.4 Excluded Viewpoints of the original ES and Addendum Report

This section deals with a number of viewpoints that were not included in the above assessment and the reasons for such exclusion.

'Viewpoint 6 ETAL (Fig 10.11)':

- As the ES report indicated that only 2 blade tips will be visible from Etal, it was not found necessary to comment on this photomontage.

'Viewpoint 8 COLDSTREAM (Fig 10.14)':

- As the photomontage showed that all turbines will be blocked by intervening vegetation, it was not found necessary to comment on this photomontage.

'Viewpoint 10 GAINS LAW (Fig 10.16)':

- Time restrictions prevented this location being checked.

'Viewpoint 3a BERRINGTON LOUGH (Fig 5)':

- This photomontage looks in the same direction as 'Viewpoint 5 BOWSDEN (Fig 10.11)', from a distance 3km closer than Bowden. It is also a very similar location to viewpoint 5a ANCROFT – Figure 7. It was therefore not found necessary to comment on this photomontage.

3.5 Recommendations on Further Photomontages Required

In order to be able to fully assess the potential visual impact caused by the proposed wind farm development, we would recommend producing the following photomontages:

- View southwest from the pub at West Allerdeen (refer to Plate 1)
- View south from West Lodge (refer to Plate 8)
- View southeast from Hutton (refer to Plate 9)
- View southeast from Fouldon Viewpoint (refer to Plate 11)
- View southwest from Camphill Viewpoint or elevated location along the A1 (refer to Plate 12)
- View southwest from Scremerston (refer to Plate 15)
- View south from Shoreswood (refer to Plate 4)
- View east from Grievestead (refer to Plate 5)

3.6 Mitigation

With regard to the description of the Mitigation Measures set out in the ES, we generally agree with the findings of the Audit of Environmental Assessment.

3.7 Summary of Visual Impact Audit

Our site visit, visual impact audit, and review of submitted documentation draws the following conclusions:

- Views of the wind farm site are more open from the north.
- Views from the south are more restricted due to intervening topography and vegetation.
- Where there are views from the north, these are particularly significant where they include long distance views of the Cheviot Hills.
- Distant views from the north are generally quite open and panoramic. Therefore, the proposed wind farm will be part of a wide field of vision and as a result not appear as a dominant feature within these distant views.
- There is a relatively large number of receptors close to the site, clustered in distinct settlements, rather than widely dispersed. It is considered appropriate that all potential viewpoints from settlements and business close to the site are clearly illustrated.
- It is considered that 2-3 medium sized wind farms (up to 15 turbines each) could be accommodated within the landscape of the wider Berwick-on-Tweed area, considering the scale of the landscape, the nature of viewpoints within the landscape and the significance of the landscape character. Further assessment will be necessary of the wider landscape context to confirm these initial thoughts.

4.0 SUMMARY AND RECOMMENDATIONS

4.1 Summary

Overall, the Moorsyde Wind Farm proposal is considered to be largely consistent with planning policy, and capable of being accommodated within its receiving environment without significant adverse visual impact such as would warrant refusal.

Whilst the submitted application is silent on some material areas of planning policy this, per se, is not fatal to the overall assessment of the scheme, as these are now set out in Section 2 of this report and can be taken into account during the decision-making process.

Importantly, it will be noted that the Policy 42 of RSS Draft Submission (June 2005) refers to "broad areas of least constraint", and given the endorsement in principle of the area south and west of Berwick for medium sized wind farms, the assessment of individual schemes, either in isolation or cumulatively, needs to take account of the criteria based approach outlined in Policy 41.

In terms of potential visual impact, once again, for the sake of completeness, and to demonstrate a thoroughly robust approach, it would be prudent to include visual assessments (photomontages) from the additional viewpoints identified in this report.

4.2 Recommendations

1. That the application for a ten turbine windfarm at the proposed location be considered acceptable in planning terms.
2. That, prior to determining the application, the LPA considers requesting the additional visual information listed in section 3 above.

APPENDIX 1

Photo Plates



Plate 1: View southwest from pub at West Allerdean, approximately 1.6km from the nearest turbine
note: most of the turbines will be openly visible from this location



Plate 2: View southeast from pub at Salutation, approximately 1.1km from the nearest turbine
note: some of the turbines will be openly visible from this location



Plate 3: View south-southwest from Shoresdean, approximately 1.1km from the nearest turbine
note: most of the turbines will be openly visible from this location



Plate 4: View south from Shoreswood, approximately 1km from the nearest turbine
note: most of the turbines will be openly and largely visible from this location

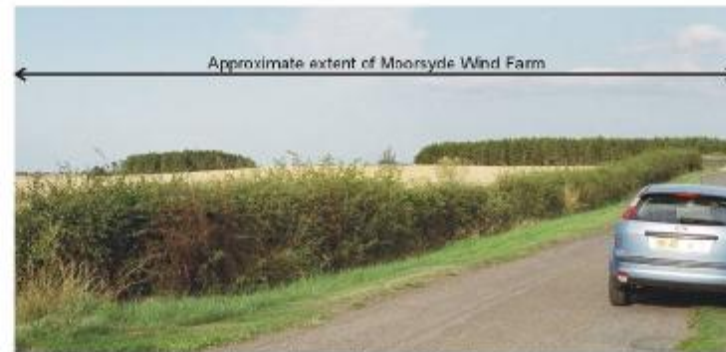


Plate 5: View east from Grievestead approximately 500m from the nearest turbine
note: a number of turbines will be openly and largely visible from this location



Plate 6: View east from Grincon, approximately 2.3km from the nearest turbine
note: a number of turbines will be distantly visible from this location



Plate 7: View southeast from Ladykirk, approximately 4.75km from the nearest turbine
note: a number of turbines will be distantly visible from this location, partly screened by vegetation



Plate 8: View south from West Lodge, approximately 4.3km from the nearest turbine
note: the turbines will be distantly visible with the Cheviot Hills in the background



Plate 9: View southeast from Hutton, approximately 8km from the nearest turbine
note: the turbines will be visible in the distance, depending on the weather conditions



Plate 10: View southeast from Chirside, approximately 12km from the nearest turbine
note: the turbines will be visible in the distance, depending on the weather conditions



Plate 11: View southeast from Foulden Viewpoint, approximately 10km from the nearest turbine
note: the turbines will be visible in the distance, depending on the weather conditions



Plate 12: View southwest from Campmill Viewpoint, approximately 9.6km from the nearest turbine
note: the turbines will be visible in the distance, depending on the weather conditions



Plate 13: View southwest from the A1 junction with the B6461, approximately 7.9km from the nearest turbine
note: the tips of the turbines may be distantly visible, depending on the weather conditions

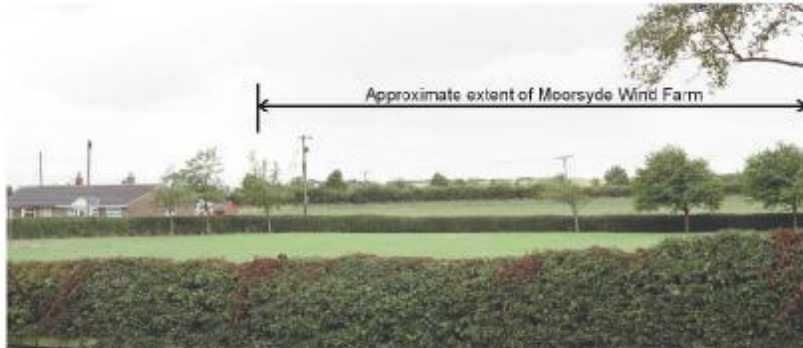


Plate 14: View southwest from Scremerston, approximately 6.5km from the nearest turbine
note: the tips of the turbines may be distantly visible, depending on the weather conditions



Plate 15: View southwest from Scremerston, approximately 6.5km from the nearest turbine
note: the tips of the turbines may be distantly visible, depending on the weather conditions



Plate 16: View northwest from Holy Island, approximately 16.5km from the nearest turbine
note: the turbines may be visible in the distance, depending on the weather conditions



Plate 17: View northwest from Bowsden, approximately 4.4km from the nearest turbine
note: the tips of the turbines will be visible, depending on the weather conditions