

## **MOORSYDE ACTION GROUP**

### **Observations on 'Wind Farm Development and Landscape Capacity Studies: South and West Berwick upon Tweed (May 2007)' by Ove Arup and Partners Ltd.**

#### **GENERAL OBSERVATIONS**

MAG welcomes the Arup report, particularly its conclusion that the landscape to the South and West of Berwick upon Tweed is not suitable for wind farm development on the scale envisaged by the Draft RSS and County Structure Plan (section 7.1).

We are pleased that the importance of the report has been recognised by Berwick Borough Council, and that this has led to the Council requesting the deletion of the South and West Berwick area as having the potential for medium scale wind farm development in the Draft RSS, in order to reflect the report's findings.

We believe the report's findings lend significant support to the refusal of the 3 current wind farm applications in the South and West Berwick area, on the grounds that their proposed size means their visual impact is too great, and that there are higher landscape capacity sites available elsewhere in the Borough and County.

The report recommends (section 6.5) that the landscape capacity for possible wind farm development of the South and West Berwick area,

"...be seen within the context of...a regional and county level appreciation of relative landscape capacity within each of the other 5 medium wind resource areas within Northumberland...",

and states (section 5.5) that, in just 2 other potential 'W' areas in Northumberland, there are at least 31 places in which wind farms would cause less visual blight than in the South and West Berwick area.

The report repeatedly highlights the settled nature of the South and West Berwick landscape, (section 4.3, 4.4, 5.5, 6.2, 6.4, 7.1) pointing out that, for visual blight at 2km, there are 21 better zones in which to place turbines at Knowesgate and Harwood and 10 better zones at North Charlton (section 5.5).

The North/South Charlton Arup report concluded (section 7.1) that the North/South Charlton 'W' area can accommodate a total of 100MW of wind farm development, which was actually greater than envisaged in the County Structure Plan and Draft RSS, and stated;

"This may be particularly helpful if other wind resource areas identified by the Draft RSS/County Structure Plan are not able to deliver their appropriate contribution, either due to constraints or lack of developer interest."

We would also like to highlight a significant difference in methodology between the Arup report for North/South Charlton and that for the South and West Berwick report. In their North/South Charlton study, Arup specifically excluded settled Open Rolling Farmland

(ORF) because,

"..it has an even distribution of scattered settlement. Visual amenity and noise considerations make it highly unlikely that wind farm development of any scale would come forward (or be appropriate) in this part of the landscape character area."

However, almost the entire area in the South/West Berwick study is comprised of settled ORF, which, if treated in the same way as in the North/South Charlton study, clearly means that almost all the South and West Berwick area is unsuitable for wind farm development.

There is also a significant difference in methodology between the Arup report for Kiln Pit Hill and the South and West Berwick report. In the Kiln Pit Hill report, Arup applied 2km separation distances to protect the setting of Grade 1 and 2 Listed Buildings. The South and West Berwick study however, fails to apply any degree of separation to protect the setting of the nationally more important Scheduled Ancient Monuments of the Duddo Stones and Duddo Tower, and the Grade 2 listed Duddo Church. Applying the methodology consistently means that any wind farm development within 2km of the Duddo Stones, Duddo Tower and Duddo Church is unsuitable, and would rule out both the 'Moorsyde' and Toft Hill applications in their current configurations.

We would question why Arup has used different methodology in the South and West Berwick study area from that used in the reports it has carried out in the other potential 'W' areas in Northumberland.

The South and West Berwick report also highlights the unacceptable visual impact of the current 'Moorsyde' application, concluding and recommending (section 7.1) that,

"Smaller "clusters" (of turbines) are favoured which...would better sit with the scale of the settled landscape."

Even if a small wind farm was proposed in the area, the report stresses the need to respect the setting of, and views from, nearby settlements (section 4.4) and to follow strict micro-siting guidelines found in Appendix B (section 6.5). We would expect Scott Wilson to re-iterate and emphasise this conclusion in their report and, that the Council will insist these guidelines are adhered to in any planning applications.

## **CRITICAL OBSERVATIONS**

MAG has four critical observations of the Arup report which give grounds for further restricting the development of any wind farms in the South and West Berwick area.

### **1). *Error in the Landscape Sensitivity Worksheet Summary***

The Landscape sensitivity of Zone 5, the area which includes the 'Moorsyde' application, has been erroneously marked as 'Medium' in Table 2. On the basis of the raw data from the Landscape capacity worksheets in Appendix A, Zone 5's summary landscape sensitivity should be scored 'Medium-Medium High' and therefore, the 'Largest wind farm type potentially acceptable' is 'Small', (less than 7.5MW). This is significantly smaller than the current 'Moorsyde' application for 18-30MW.

The Landscape Capacity worksheets (Appendix A) recognise the similarities in landscape

between the contiguous Zones 5 and 10 which share the same land-mass of gently rising ground towards the West. In fact, Table 2 describes both as having “A gently undulating landscape”.

On a line by line basis, the worksheets show that Zone 5 is less suitable than Zone 10 for wind farm development and yet Zone 5, coincidentally the zone with a pre-existing application, is deemed suitable for ‘Small-Medium Small’ development while Zone 10 is only deemed suitable for ‘Small’ development.

Further evidence for the mis-categorisation of Zone 5, is that Zones 3 and 4 are only marginally less suitable for wind farm development than Zone 5, but are given ‘Small’ and ‘Small-None’ suitability for wind farm typologies. Zone 11, on average, scores as well as Zone 5, yet Zone 11 is deemed to be totally unsuitable for any wind farm development.

Correcting this error requires that Zone 5 be deemed suitable only for ‘Small’ wind farms of less than 7.5MW.

**2) *Error in Scenario Performance analysis (section 6.4.1) through failure to fully reflect information contained in Table 11***

The analysis of Scenario C has omitted the “possibly unacceptable” effect on a “small number of isolated dwellings” among which Shoresdean is highlighted as experiencing a “severe” impact in Table 11.

Neither scenario B or D in Tables 10 and 12 have any ‘severe’ potential visual effects, therefore the conclusion (section 6.5) that scenario C performs marginally the best is incorrect.

**3) *Capacity limits used in the analysis of Cumulative Impact (section 6.3) are higher than the Landscape Analysis (Section 4.3) recommends***

The report recommends (section 4.3.1) that, in the landscape area characterised as Open Rolling Farmland (ORF), which encompasses all three current wind farm applications, medium scale (26-49MW) wind farm development would NOT be appropriate where it interferes with key views of the Cheviots.

The report highlights the large number of key views of the Cheviots, noting (section 4.3.3) “...The area’s simple undulating form...allows fine views across to the Cheviots from the network of straight roads.”

The report therefore, sets an upper threshold of 25MW total capacity for potential wind farm developments in Open Rolling Farmland with views of the Cheviots (section 4.3).

This upper threshold is not applied correctly in the cumulative impact assessment (section 6.3), which includes the areas containing all three current wind farm applications, and which are all characterised as Open Rolling Farmland with views of the Cheviots.

The cumulative capacity of these three areas should be 25MW, based on the capacity of the landscape category they are situated in, being Open Rolling Farmland with views of the Cheviots. However, a higher total capacity of 30-40MW is incorrectly used.

This higher total capacity figure is the landscape capacity which the report concludes the

whole South and West Berwick study area could support (section 7.1) and is therefore not appropriate for the assessment of cumulative impact of potential wind farm developments in Open Rolling Farmland with views of the Cheviots.

Even after setting an upper threshold of 25MW for Open Rolling Farmland with views of the Cheviots, the report (section 4.4) guards against massed turbines of unrestricted height, which it defines as greater than 100m, by creating a 'small-medium-small' category of up to 6 turbines, highlighting;

"The nature of the settled, relatively low-lying landscape at Berwick" and that "... nine turbines of unrestricted height [greater than 100m] in a single proposal...would be too large for this landscape".

For the avoidance of doubt, it is repeated again in the report's conclusions (section 7.1) that smaller "clusters" of turbines are favoured.

In addition, the Draft Final Report (March 2007) made it clear (section 7.1) regarding the 3 current wind farm applications, 'Moorsyde', Barmoor and Toft Hill, that;

"... all of these 3 applications would need modification to be acceptable in cumulative landscape and visual terms; the current applications are just too extensive when viewed in combination".

#### **4.) *Failure to observe separation distances used in earlier Landscape Capacity studies***

The scenario analysis used in the Kiln Pit Hill Landscape Capacity study (section 6.2) applies a 2km separation distance from the Grade 2 listed church of St Andrews and the Grade 1 Hopper Mausoleum. In the study findings (section 7.1), Arup state that the; "...report has given significant weight when considering a maximum acceptable level of wind farm development to the Grade 1 Listed Mausoleum, the associated church and their hilltop setting; reflecting the Mausoleum's status as the highest level of National designation for cultural heritage. However, it is clear from the general thrust of recent government and policy guidance that even this circumstance should not automatically rule out a renewable energy project. Nevertheless, given the demonstrated greater capacity of other wind resource areas in the County/District, the environmental benefits of the suggested level of development at this location needs careful consideration; the area could remain free of wind turbines and the opportunity taken to concentrate development around other proposals in less sensitive landscapes with less problematic setting issues."

The same situation exists in the South and West Berwick area because the Duddo Stones and Duddo Tower are accorded an even greater level of heritage protection by their Scheduled Ancient Monument status and Arup have demonstrated that there are other less sensitive landscapes with greater capacity for wind farm development available in the Borough and County.

The scenario analysis for South and West Berwick (section 6.2) has failed to observe the 2km separation distance from the Duddo Stones, Duddo Tower and the Grade 2 listed Duddo Church. Applying the Arup methodology consistently across the County, would mean parts of Zones 2, 3 and much of Zone 5 would be totally unsuitable for any wind

farm development.

The current 'Moorsyde' and Toft Hill applications fall into these Zones and should, therefore, unless the applications are altered, be refused permission due to their visual impact on the Duddo Stones, Duddo Tower, Duddo Church and their settings and the demonstrated greater capacity of other wind resource areas in the Borough and County.

## **SUMMARY**

In summary, MAG welcomes the Arup report and its support of our overall views that:

1. The landscape to the South and West of Berwick does not have the capacity for medium scale wind farm development of the scale envisaged by the Draft RSS;
2. The Borough should refuse the 3 current wind farm applications in the South and West Berwick area as their impact is too great, both individually and therefore cumulatively, on their landscape of Open Rolling Farmland with views of the Cheviots given their proposed size, and the availability of higher landscape capacity sites elsewhere in the Borough/County; and
3. Even if a small wind farm was proposed in the area, it should respect the setting of, and views from, nearby settlements and follow strict micro-siting guidelines.

Specifically, as regards the current 'Moorsyde' application for 10 turbines of up to 110m in height, the Arup report supports our view that the application should be refused, as the report concludes that:

1. "The nature of the settled, relatively low-lying landscape at Berwick" means that "... nine turbines of unrestricted height (i.e. greater than 100m) in a single proposal... would be too large for this landscape";
2. Smaller "clusters" are favoured which...would better sit with the scale of the settled landscape;
3. Correcting the report for its quantitative inconsistencies means that Zone 5 is capable of supporting no more than 7.5MW of generating capacity; and
4. According to the Duddo Stones, Duddo Tower and Duddo Church the same degree of protection that listed buildings have been given in other landscape capacity studies in the County, rules out the 'Moorsyde' application in its current form.

We hope that the Borough's officers and members will take note of the comments we have made when they are advising on, and determining, the current wind farm applications in the South and West Berwick area. We firmly believe that a refusal to grant planning permission for all 3 current wind farm applications is strongly supported by the Arup report.