



CULTS BIELDSIDE AND MILLTIMBER COMMUNITY COUNCIL

290 North Deeside Road,  
Cults, Aberdeen  
AB15 9SB

4th April 2012

Robert Forbes  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4, Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Mr Forbes,

**120166: Proposed erection of a single 800 kW wind turbine and associated ancillary equipment and access track, South Lasts Farm, Contlaw Road, Milltimber**

I am writing on behalf of Cults, Bieldside and Milltimber Community Council (CBMCC) to comment on the above planning application.

CBMCC notes this application relates to a location in green belt and objects on the basis that this development would not comply with Local Development Plan Policy NE2- Green belt '*No development will be permitted in the green belt for purposes other than those essential for agriculture, woodland and forestry, recreational uses compatible with an agricultural or natural setting, mineral extraction or landscape design*'.

Furthermore, CBMCC consider that at 86.5 metres tall the size of the proposed turbine is considerable. It would be very visible and prominent on the skyline. It would be a significant intrusion on the landscape and go against the principle in the Aberdeen Local Landscape Strategy to '*safeguard significant open views and aspects*' and be inconsistent with the statement in the Strategy that '*The measures to be applied will consist of a general presumption against any development in the green belt which will affect landscape setting - e.g. on the tops of hills, or in valley bottoms, on areas of recreational open space, woodland and wildlife sites, and on intermediate areas between vantage points and landscape features*'.

In addition there would be a negative impact on the amenity value of the proposed site. Currently it is a very popular location for leisure activities in particular walking, cycling and horse-riding.

CBMCC is concerned that approval of this proposal would set a precedent for further applications in this and other areas in the green belt resulting in spoiling of Aberdeen's admired western landscape.

Christine McKay, Planning Coordinator. 290 North Deeside Road, Cults, AB15 9SB

CBMCC does not wish to see this application approved and requests that the above concerns are taken into consideration during review.

Yours faithfully,

**Christine McKay**

**Planning Coordinator**

**Copy to: Councillor Marie Boulton, Councillor Aileen Malone, Councillor Alan Milne**

# CULTER COMMUNITY COUNCIL



St Quentin  
18 Hillside Road  
Peterculter  
Aberdeenshire  
AB14 0TX

23rd May 2012

Mr Robert Forbes  
Senior Planner (Enterprise, Planning & Infrastructure)  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen AB10 1AB

Dear Mr Forbes,

**Planning Application P120166: South Lasts Farm: erection of a wind turbine with ancillary equipment and access track.**

Before tackling this application the members of Culter Community Council (CCC) had a discussion on 'green energy' in general and agreed that:

- they very much support the principle of development of green energy
- they welcome the development of tidal power as bringing a more constant and reliable source of green energy
- support urgent research into geothermal power and into carbon capture so that natural resources such as coal and gas from shale facing as well as oil can still be used without release of carbon dioxide
- support the existing green energy production by hydro and nuclear power
- support micro-generation of green energy such as:
  - single hydro turbines
  - photo voltaic panels or similar on buildings
  - small wind turbines for specific single business/project use.

They were less supportive of industrial scale wind turbines whether as single units, in clusters or as farms because of the noise they emit; the necessity for them to be intrusive in the landscape; and their potential through electromagnetic emissions to disrupt radar, radio signals, telecommunications (mobile phones and broadband) and television signals. This is particularly concerning in urban situations, including the Green Belt which is intended according to Scottish Planning Policy (SPP, Green Belts, para 159) to give people "access to 'protected and enhanced' open space" for informal (and appropriate formal) leisure. Since the extant Structure Plan and the new Local Development Plan now allows substantial development in the Green Belt the protection of what is left for public

enjoyment and wellbeing is even more important. To catch the wind, wind turbines have to be very visible. They therefore have the potential to *degrade*, not “protect and enhance the quality, character and landscape setting” of the Green Belt and *deny*, not “protect and give access to this open space.” The other forms of green energy which we support are in so many ways far less intrusive, distracting, and potentially damaging by have minimal effects and could even enhance their environment.

Against this background this particular application (P120166) was discussed at two meetings of CCC and also in more detail by CCC Planning Sub-group. As a result, I have been asked to write to let you know of their deep concerns and specific objections, comments and questions about this very large proposed wind turbine to be built in the Green Belt and connected to the National Grid.

In this application we are considering a commercial/industrial enterprise providing electricity far in excess of South Last Farm’s domestic and business needs. This may be seen as a diversification of farm business, but in considering the application and supporting documents, we find that numerous policies within the Local Development Plan will be contravened. We strongly object to this disregard for policy as follows:

**Policy NE 2 : Green Belt**

This application is contrary to the Green Belt policy in the Local Development Plan. It cannot be classed as essential for agriculture or for recreational uses compatible with agriculture. Nor does it satisfy any of the permissible exceptions listed in NE 2.1 a, b, c or d, or in NE 2.2. The proposal may be *within the farm boundary* (1a) but at 86 metres in height, will not be *small scale* (1b), its *activity* will be *intense* where none existed before (1c) and the turbine cannot be counted as *ancillary* to the farm business, when a turbine of this capacity is intended to export electricity to the Grid (1d). Neither can the proposal be classed as essential infrastructure (NE 2.2) when it is obviously a commercial venture, to which there are several alternatives. To permit this development would not only be contrary to the Local Development Plan, but would also open up the Green Belt to sporadic development of wind turbines.

**Policy Bi 1 : para 1**

This states that Aberdeen City Council (ACC) will support development of business and land allocations as set out in the Local Development Plan, and within that, “the development of new business and industrial uses will be permitted within areas zoned for this purpose.” This application is contrary to this policy and should therefore be refused. The environmental and supporting documents included with this application confirm this for the members of CCC, to the extent that they consider this to be a “bad neighbour project/use, which should be located in a single industrial area or within one part of a larger industrial estate.” (Policy Bi 1, last para.) These points are reinforced by the purpose of the Green Belt (described in SPP: para. 159). To approve this application would not only be contrary to Policy Bi 1, but would also open the door for sporadic development of massive wind turbines in the Green Belt by this or other developers (contrary to its purpose in SPP: para. 159 and to Policy NE2).

**Policy NE 1 : Green Space Network**

This proposed turbine (86 m/282 ft in height) will be situated on the 120 m contour on the north-west side of Beans Hill, close to the summit but in an area which has been removed from the Green Space Network in the newly adopted LDP. We are given to understand by the LDP Team however this has been done because the Land Reform Act already gives the same protection to all of the Green Belt areas for informal leisure use by walkers, horse riders, cyclists etc. without the actual need for a separate Green Space Network policy. The expectation is therefore that the City Council’s Green Space Network policy applies to all sites in the Green Belt.

The LDP Policy NE 1 para. 1, states that “the City Council will protect, promote and enhance the wildlife, recreational, landscape and access value of the Green Space Network (and therefore Green Belt) to which proposals for developments that are likely to destroy or erode its character or function will not be permitted.” This is reinforced by Scottish Planning Policy: paras. 149 & 150. The area

around the site is well used by local residents for informal leisure (one of the purposes of the Green Belt): walking, cycling and horse riding for exercise; to enjoy the spectacular views around in Lower Deeside from this viewpoint and to study the flora and fauna (particularly the birds). The presence of an industrial-sized turbine will erode the landscape character of the area, especially seen from the other well-used local viewpoints, such as the Core Paths and viewpoints on the forest walks at Gairnhill, Blacktop and Foggieton. It will also erode or even destroy the recreational use of the area by its size and overpoweringly intimidating effect, including noise, when in use, thereby discouraging or even stopping people from exercising their rights to use the area for informal leisure.

#### **Policy NE 8 : Natural Heritage**

We are pleased to see that this policy goes beyond protecting only designated sites as well as protected species (NE 8.4 "Natural heritage beyond the confines of designated sites should be protected and enhanced") and also asks for "evidence of any adverse effects on protected species as well as the need for the development" (in NE 8.1). The S.A.C. environmental survey included in support of this application is quite comprehensive, but we are additionally aware of sightings of pipistrelle bats, merlins, barn owls and tawny owls around this site. The survey report also does not cover more subtle long-term effects on the flora, which have been observed by research over a 10 year period to change from temperate to sub-arctic species, through the cooling effect of the blades – and, importantly, the knock-on effects this may have on the food chain.

#### **Policy NE 9 : Access and Informal Recreation**

The Local Development Plan states that "new development should not compromise the integrity of existing or potential recreational opportunities, including access rights, core paths, other paths and rights of way." One of the paths for informal leisure around Peterculter leads up Beans Hill from Contlaw Road, virtually following the 123 metre contour, bringing it very close to the proposed turbine. This path is advertised in our Culter Explorer Leaflet available in the library and other public places in the village. Even if the path were to be re-routed/replaced, the overpowering presence and noise of the wind turbine would discourage its use and remove the site from informal recreation and leisure, contrary to this policy's aims outlined in LDP para. 3.85 and this Policy NE 9.

#### **Policy D 6 : Landscape**

The aim of this policy (LDP para. 3.27) is to "protect, maintain and manage the natural topography and landscape of Aberdeen's unique setting of rural, informal and formal open spaces," in essence, the Green Belt. The site proposed for this massive wind turbine contravenes the criteria on several points:

- It will not avoid "adversely affecting landscape character" and "sense of place for a particular part of Aberdeen", namely the city approaches in Lower Deeside (D 6.1)
- It will obstruct important views of Deeside and the city surrounds from publicly accessible vantage points, recreation areas and pathways (D 6.2), as described above in Policy NE 1.
- It will be obstructive in the landscape views, not only for local residents, but also for visitors from Royal Deeside and the Cairngorm National Park, for a ½ km stretch of the A93, just outside Peterculter, which is the "western gateway" to the city. (D 6.2)
- It will cause, not avoid, disturbance or even loss of an important recreational resource (D 6.3) as described above (in Policy NE 9).
- In addition, in the Landscape Strategy, it points to a general presumption against any development in the Green Belt which will affect landscape setting – e.g.: on hilltops or ridges, and affecting recreational open space.

In the SAC document Supporting Information Section 5.7 pp 85 and 86 the Zone of Theoretical Visibility (ZTV) is discussed but mainly for more distant areas and not for those small communities in the Green Belt part of Peterculter such as North (and South) Lasts, the Baads/Hillcrest Court, Mid Anguston and others which will likely to be in line of site of the turbine. Why is this? The same question also arises for Peterculter Golf Club.

### **Policy R8 : Renewable and Low Carbon Energy Developments**

Objections (with reasons) that this application will be “detrimental to the local environment including landscape character” and local residents use of the site area (R 8.1 and R 8.Wind Energy Developments, WED 2) have already been given above under Policies NE 1, NE 2, NE 8, NE 9, D 6 and Bi 1.

- The effect of noise has been included in the above objections since excessive noise is a health hazard. In the study on noise presented in support of the application, it shows that according to the manufacturer’s specification and guarantee, the noise levels range from 95-100 dB (decibels) over a range of wavelengths and wind speeds of 6-10 metres/second (15-30 miles/hour) (Table 3). This represents a “moderate to strong breeze” during which people could still be using the site for leisure. We understand that 100 dB is a level at which permanent damage to hearing can occur. This would most certainly prevent people’s use of the site for recreational opportunities (NE 9).
- Further from the turbine, the sound levels will drop off (as shown in the study). For example, at North Westfield, the second closest dwelling to the site (536 m away), background noise was carefully measured as 37 – 41 dB (Tables 10 and 11). Turbine noise was assessed to have dropped to 36.5 dB at that distance. Below Table 11, it states that “turbine noise needs to be 35 dB or less than +5 dB above background during the day. Table 11 shows that the daytime background is high (41 dB) so the difference between predicted turbine (36.5 dB) and background noise (41 dB) is well within limits.” However, no information is given on the new resultant background noise (lesser or greater than 41dB?). Information on night-time noise levels or their acceptability has not been included or compared. Is it different?
- The effects of vibration do not appear in the supporting information. This can be significant, depending on the type of the underlying bedrock and its ability (or not) to transmit sound and how far.
- We question R8.WED 3, regarding the safety of a turbine site in the vicinity of a busy road. The proposed wind turbine will be sited about 1.4 km from the narrow B979, where traffic has to pass with care, and serious accidents have occurred. This is a very busy commuter route, which also carries a significant proportion of heavy goods vehicles (10 – 12%). In the supporting documents (p113 Section 11.2 Road Safety) it is suggested that “driver distraction” from the turbine and risks from it “will be reduced as drivers become used to this and any other turbine in the landscape.” This assumption may be generally true, but it takes only one driver to be momentarily distracted by movement in his/her peripheral vision to cause an accident. The same section of the document also quotes a study (Schreuder, 1992) on two accidents “in the vicinity of wind turbines” where the advice given was that “turbines should not be located in places where the driver needs to pay great attention, i.e.: road junctions.” About 1.7 km from the turbine, there is a junction on the B979 with a road that leads to Leith’s sand and gravel quarry, a livery equipment sales shop, and the houses at North Lasts Farm and converted steadings. This junction is also near two blind corners on the B979 where there have been accidents in the past, one fatal. This only adds to our concerns of a wind turbine being built at the proposed site “in the vicinity of this junction” and adds to the case against approval for it being granted.
- In the section on Aviation in the Supporting Information Document (pp108 – 110 Section 7) it states that Aberdeen Airport lies about 9.5 km north of the proposed site, within the 15 km physical safeguarding distance from the runway. It adds however that the sharply rising terrain to the south and west of the airport, reaching heights above the tip of the proposed turbine will ensure aircraft remain well above the turbine also. The document also states that “the turbine will lie beyond the physical safeguarding limits of the Culter Heliport” (properly known as HJS Helicopters, Aviation House, Lower Baads, Peterculter) the helicopter pilot training school and business. This heliport is 3.5 km to the west of the turbine site, but the report does not state the

actual distance required for the safeguarding zone for a heliport, to give an indication of how close the new turbine will be to that limit.

- We are concerned about the effects of electromagnetic interference from the turbine, to aviation communications (radar and radio signals) required for air traffic control at Aberdeen Airport (R8.WED 1). The Supporting Information states that, "intermediate high ground at Kinghill Wood just 3 km north-east of the site at 213 m (207 m on our OS Map) at the peak will be sufficient to block any impact on the Perwinnes radar station from the proposed turbine at 205.5 metres (actually 206.5m)" No evidence is given on how this was calculated or assessed or how close to the safety limits this protection lies. There is also no reassurance or evidence given on any possible impact on the receipt of signals by approaching or departing aircraft and helicopters.
- Of even more concern for our community is that no mention is made on any impact on interference on radar and radio signals at the helicopter training facility at HJS Helicopters Culter Heliport and RVP). When one of our members went to ask the owner if he or we should be concerned about this, we discovered that he had never heard about the application and he would not have seen the public notice because the Citizen is not delivered outside the urban "core" of Peterculter. We question why this was not addressed in the Supporting Information and should it not now be considered?
- Our search for information has led us to understand that planning applications requiring answers on the potential effects of the electromagnetic interference of wind turbines on the signals from radar stations in the UK are researched by NATS Headquarters. Is this just a desktop study or is work done locally to verify the conclusions reached? We also ask if this is carried out for the smaller airports such as the heliport in Culter as well as for Aberdeen Airport and Heliport?
- Under Policy R8.WED 1, we are concerned at the incomplete information given in the Supporting Information on the potential impact of the turbine on telecommunications and what possible effect it will have on the receipt of mobile phone and broadband signals for local residents and businesses.
- Again, under Policy R8.WED 1, the members of CCC were dismayed and deeply concerned that the "initial assessment of likely TV interference showed that a total of 1389 homes would be likely to be affected" without giving any indication of the level of interference or on the location of these homes. The Durris masts are directly visible from and serve many homes in Culter. Interruption of the signals or even reduced quality of signal is not acceptable to the well-being of the residents in the homes affected.  
The paragraph ends by saying that "Providing other means of service is one way of minimising inconvenience to neighbours." If this wind turbine does gain planning permission, then we ask that a condition is attached that the developers are required to set up an escrow fund before construction starts, to provide "other means of service" as and when people find that their television service is blocked out or even diminished by interference.

As and when more information and evidence become available, the members of CCC may modify some of their objections presented above.

Yours sincerely,

Lavina C Massie (Planning Liaison) Culter Community Council

Cc: Councillors Boulton, Malik and Malone

**From:** "Buchans" [REDACTED]  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 4/3/2012 5:38 pm  
**Subject:** planning application Ref: P120166  
**Attachments:** Wind turbine 3 Cromar Garden3.docx

Dear Sir or Madam

Please find an objection to planning application Ref: P120166 attached from Kingswells Community Council

Thank you

Kind regards

Barrie Buchan (Mrs)

Chair





3 Cromar Gardens  
Kingswells  
Aberdeen  
AB158TF

3<sup>rd</sup> April 2012

Development Management Team  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen AB10 1AB

Dear Sir or Madam

***Application Ref: P120166 - South Lasts Farm, Contlaw Road, Milltimber***

***Proposed erection of a single 800 kW wind turbine and associated ancillary equipment and access track.***

Kingswells Community Council wish to object to this planning application on the following grounds.

- Visual Impact and size.
  - This immense industrial structure is not suitable for open, rural countryside within the city boundary. It is out of scale and would seriously impair the attractive views over to Clach na Beinn, Mount Keen and Lochnagar and cause a loss of amenity to the many walkers, cyclists and horse riders who use this area.
- Setting a precedent
  - KCC is seriously concerned that if this application was passed, then other land owner within the city would apply for similar structures on equally inappropriate greenbelt sites sites.
- Noise /Health Impact
  - There are well documented health implications for people living near these structures. KCC have concerns for nearby residents as this structure is very close to residential houses. We also have safety concerns for the many people who use this area for recreational purposes.
- Yours sincerely
- Barrie Buchan
- Chair
- Kingswells Community Council

**From:** "Lennon, Jenny" [REDACTED]  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 11/04/2012 12:22  
**Subject:** Planning application 120166 - turbine at South Lasts, Milltimber

FAO Robert Forbes

Planning application 120166 - Turbine at South Lasts Farm

The above planning application came to our attention via the Aberdeen City Planning website. We have several issues we would like to raise in relation to this proposed wind turbine. Firstly, the collision risk of 0.08 red kites killed per year does not take into account the increasing population density and range of the species. Given the current productivity of red kites in Aberdeen within five years there may be more than 50 pairs locally, compared with the 16 nesting pairs in 2011. The topography of the site of the proposed turbine will cause it to remain an attractive hunting/scavenging area as has been shown from the VP flight lines during ecological monitoring. We would encourage the council to enforce some kind of post-construction monitoring of this site to determine the impact on kites and monitor any displacement behaviour or collisions of kites or geese. Simple measures can be taken to reduce the collision risk to kites also. These include making the vegetation beneath the turbine unattractive to kites or shutting down the turbine in periods of peak activity, such as during silage cutting, when kites are very active in foraging in lowland agricultural areas.

If the number of wind turbine proposals increases in this area then we would urge the council to carry out some sort of post-construction monitoring as well as cumulative impact assessment on these sensitive species, including a population viability analysis (PVA) on the red kites and the affect on the Loch of Skene SPA qualifying species. SNH have produced guidance on the cumulative impact of windfarms on birds which can be found here <http://www.snh.gov.uk/docs/A675503.pdf> <<http://eu.vocuspr.com/Url.aspx?525905x20309x309075>> .

Regards

Jenny Lennon

 RSPB Scotland

Forest Lodge  
East Brotherfield  
Kingswells  
Aberdeen  
AB15 8QN  
26 March 2012

Development Management Team  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen AB10 1AB

**Objection to Planning Application Reference 120166**

Dear Sir/Mm,

We would like to lodge a formal objection to the planning application to erect a 800 kW 86.5m wind turbine at South Lasts Farm (Planning Application reference 120166).

Our objection is based on:

- the substantial and unwarranted landscape impact to this greenbelt location which is contrary to the Local Development Plan
- and, the loss of amenity to the greenbelt area immediately around this proposed turbine installation for the citizens of Aberdeen

in contrast to the minimal environmental, economic and social benefit to the local community of this particular commercial turbine installation.

In support of this objection we attach:

- A) Specific Comments on the Application and
- B) General Comments on the Landscape Assessment

As a separate observation we also note that it would seem unusual for such a planning application, ie a 86.5m turbine installation within the City, to be processed without adjacent property owners, land users or businesses in the locality being directly informed or consulted. As a resident of this vicinity for 25 years and a neighbouring land owner it was only by accident that I heard about this specific application.

We would expect that there are a significant number of people who would be greatly surprised to hear that comments on such a prominent application are due by 4 April.

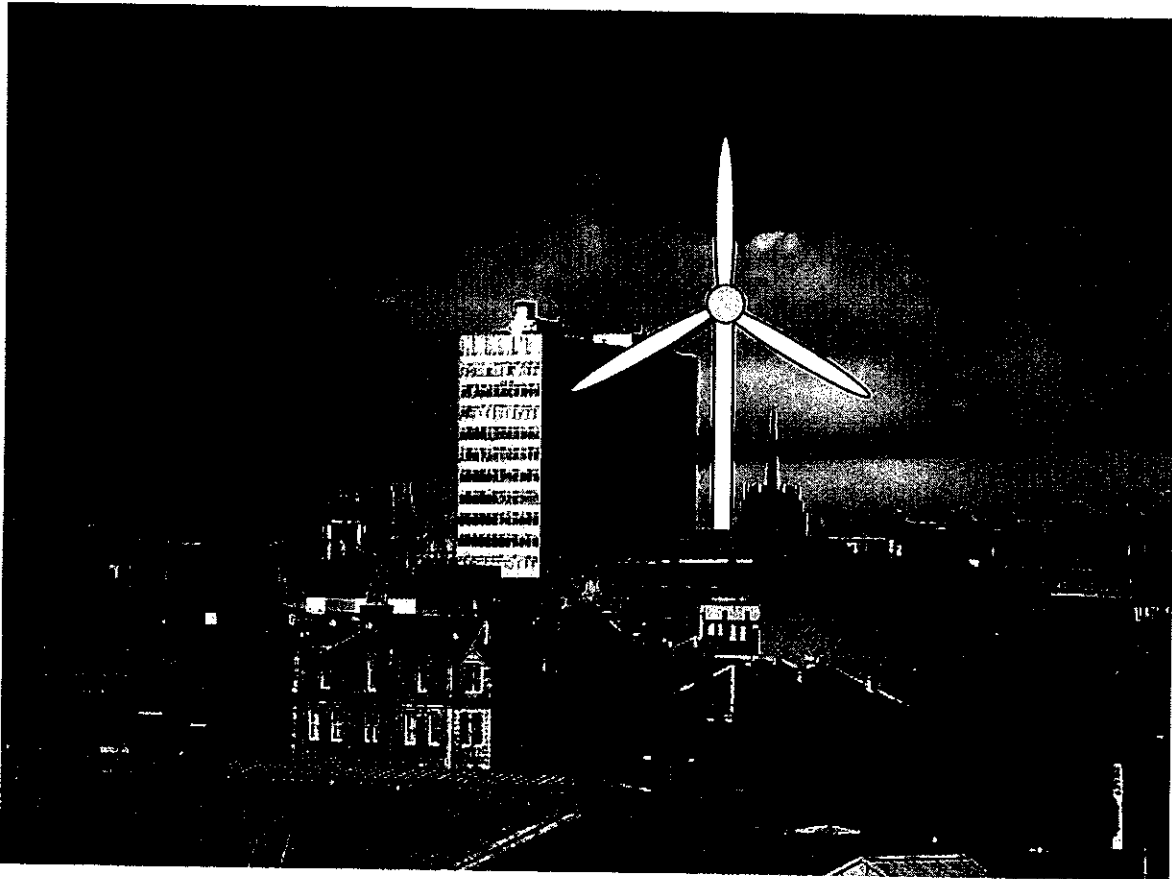
Yours Sincerely

Gavin and Patricia Prise



**Formal Objection to Wind Turbine Application in the Aberdeen City Greenbelt**

**Planning Application Reference 120166**



Note - Visual representation merely to give sense of size of this greenbelt industrial plant application

City Development Services Letters of Representation	
Application Number:	120166
RECEIVED	02 APR 2012
Dev. (North)	Dev. (South)
Case Officer Initials:	REF
Date Acknowledged:	03/04/12

## A) Specific Comments on the Application

### 1. Greenbelt Policy

The application recognises the Local Development Plan Policy NE2- Greenbelt

***No development will be permitted in the green belt for purposes other than those essential for agriculture, woodland and forestry, recreational uses compatible with an agricultural or natural setting, mineral extraction or landscape design***

The applicant contends that an exception should be made to this policy on the basis that:

- "The proposal will reduce the environmental effect of the existing (agricultural) activity by offsetting the use of carbon dioxide derived energy
- The development is small scale
- The intensity of the existing agricultural activity will not be increased"

A turbine with a total height of 86.5m cannot be considered small scale. Figure 1 provides a stark visual representation of the size and as defined in Aberdeenshire Council's guidance for assessing Wind Energy Developments

***"1.14 In a rural environment wind turbines should be classified as follows:***

- ***Large >50m+to hub and/or >80m to tip***
- ***Medium 30-50m to hub and/or 48-80m to tip***
- ***Small <30m to hub and/or <48m to tip"***

the turbine installation proposed is clearly large. Furthermore as shown by the assessment attached the landscape impact to this greenbelt area is also large.

### 2. Landscape Visual Impact Submission

In the Landscape Visual Impact assessment it is noted that the area which will, to some degree, have visibility of this 86.5m installation (1.6 \* the height of St Nicholas House) ranges across a vast swathe of land (Applicant Drawing No 11792-008) to the immediate West of Aberdeen City. The LVIA proceeded to include a "selection" of viewpoints which were purported to be representative of the main landscape and visual receptors in the study area. It is noted that the whole area along the Black Top to Easter Ord Road was excluded from this Landscape Visibility Impact Analysis. It is also noted that the "representative" Zones of Theoretical Visibility (ZVTs) were selected specifically at relatively low visibility receptors such as Viewpoints 5 and 6.

As shown by the comments on the landscape assessment attached there are numerous receptors with much greater visibility/landscape impact than reported in the LVIA submitted. In addition by looking at alternative ZVTs only a small distance from some of the selected viewpoints (eg Viewpoint 5 and 6) the proposed installation will be much more visible and intrusive to the landscape than represented in the application. Hence the LVIA, while superficially seeming quite plausible, understates the overall Landscape impact by a significant degree.

Aberdeenshire Council's guidance for Wind Energy Developments states that:

***3.5 Proposals for a wind energy development should avoid being sited on prominent ridgelines, hills or sensitive skylines.***

The LVIA included in the application infers that this site is not a prominent location. The images presented in this document show quite clearly that this location is in fact a ridgeline, a hill and indeed also a sensitive location sitting as it does in the greenbelt directly to the West of the City.

The LVIA submitted in the application states that:

***As a whole though, the landscape within the vicinity of the application site is considered to be of medium sensitivity to this type of development proposed and in which the turbine would not be anomalous.***

This assessment completely misses the key point that this location immediately to the West of Aberdeen which is within the City greenbelt provides panoramic views of Deeside and is an area of high amenity value to many residents, those pursuing leisure activities and those commuting to home/work. As such, the landscape sensitivity to large-scale (86.5m) turbine installation (1.6 \* the height of St Nicholas House) at this ridge-line location is high and as shown by the attached images it would in fact be quite anomalous.

### **3. Safety / Amenity Value**

The application makes no reference to the impact on amenity value of the areas immediately surrounding the proposed installation. Many people use the right of way from Silverburn to Contlaw Road as a through route for walking, cycling and horse-riding. This area has easy access from the West of Aberdeen, Black Top Forest Car Park and is also in walking distance of Peterculter. This particular right of way as shown on Applicant Drawing No 11792-003 runs within 500m of the proposed installation for around 1.5km. For walkers and cyclists the 86.5m turbine installation will be quite intrusive however for horse riders the impact could be not only intrusive but could also present a safety hazard which would result in this thorough-fare having a significant amenity loss to the local community and those visiting for leisure purposes.

## B) General Comments on Landscape Assessment

A survey of alternative ZVT's has been completed to provide an alternative perspective on the impact of this application upon the landscape. This is not intended to be a comprehensive quantitative assessment; it simply provides a supplementary qualitative view of the landscape impact of this application. The images attached were taken on 21/3/12 between 3pm and 4pm from various visual receptors situated at a distance of 1-5km from the proposed turbine installation. These include through routes, amenity locations and houses and are from a variety of perspectives to the north, east and west of the proposed turbine installation. The turbine image, which has been superimposed, is scaled to approximate the 60m turbine shaft with 26.5m blades (total height 86.5m / circa 270ft).

This particular green belt area has many different land uses and is an area recognised as having high amenity value with immediate proximity to many areas of housing and leisure usage. The images show that quite contrary to the assessment included in the application, this commercial turbine installation will cause substantial change to and indeed will have a significant impact on the landscape.

This proposal is out of context with the rural and impressive landscape setting of this green belt area with its dramatic vista across Lower Deeside which is appreciated by so many.

The most significant impact is perhaps the perspectives from Black Top Woods (Figure 5) and from the top of Bailieswells Road (Figure 11). These are used by hundreds of the citizens of Aberdeen and the Shire on a daily basis and currently provide uninterrupted views of Deeside to Clach Na Beinn, Mount Keen and Lochnagar. These views have been enjoyed by many over a great number of years and are clearly part of Aberdeen's natural heritage.

This Aberdeen Local Landscape Strategy talks to "*safeguard significant open views and aspects*". This application for large commercial turbine installation within the greenbelt is clearly contrary to this objective.

In addition the Landscape Strategy notes safeguards to be applied to the green belt, "*The measures to be applied will consist of a general presumption against any development in the green belt which will affect landscape setting - e.g. on the tops of hills, or in valley bottoms, on areas of recreational open space, woodland and wildlife sites, and on intermediate areas between vantage points and landscape features.*" Again this application for the installation of a wind turbine 1.6 \* the height of St Nicholas House is in complete conflict with this safeguard.

It is very noticeable that the images presented in the planning application have all been selected specifically to avoid perspectives where the turbine installation is on the sky-line, whereas in practice for most visual receptors (see Figure 13) to the East, North and West, the installation will be very prominent and clearly impinging directly on the sky-line. This "careful presentation" in the application is exemplified by the perspective presented in the application from Westhill (Location 5). The perspective shown in Figure 12 is taken from the Tesco Petrol Station at Westhill which is approximately 100m from the perspective ZVT 5 shown in the application. The range of perspectives attached in this document highlights that this turbine will make a visible landscape impact on an

area enjoyed by many whether at their houses, their leisure activities or their work across a significant distance.

It is clear that while the applicant's landscape assessment may seem thorough, their careful selection of viewpoints has misrepresented the situation. As shown by the images attached herein, based on a sample of more realistic viewpoints, the impact will be substantially more than registered in the application and indeed would represent a "substantial change" to the landscape by any form of impartial assessment.

As such, this commercial turbine proposal in a prominent ridge-line location where it will have such a substantial landscape impact upon the greenbelt to the West of the City, should not be approved.

Furthermore, approval would set a precedent which could lead to further application on Beanshill and other prominent landscape features within the greenbelt such as Brimmond Hill with the comprehensive destruction of Aberdeen's impressive western landscape assets.

There are ample locations and many potential sites for wind turbine installations across the North-East countryside in relatively remote locations which do not have the landscape or amenity value of the greenbelt of Aberdeen City. The benefits accruing to the people of Aberdeen for the development and operation of this particular single turbine installation are by far outweighed by the negative landscape impact for the City.



## Images Showing Landscape Impact of Proposed Turbine Installation

1. St Nicholas House / 86.5m turbine size visualisation
2. Malcolm Road Looking East
3. Malcolm Road from Leith's Quarry
4. Easter Ord looking South-East
5. Mill of Brotherfield looking South East
6. Looking South West From Black Top Woods Forest
7. Looking West from Lower Black Top Woods
8. Looking South from East Brotherfield Livery
9. Looking South from Forest Lodge
10. Looking South West from Rotten of Gairn
11. Looking West from Black Top
12. Looking West from the top of Bailieswells
13. Looking South from Westhill Tesco Petrol Station
14. Location Map

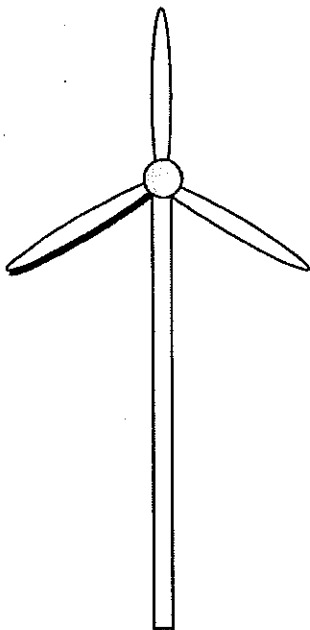
### Note:

Pictures Taken on 21/3/12 between 3pm and 4pm

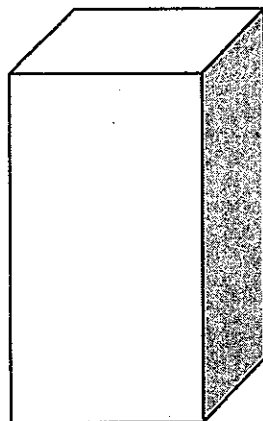
Turbine image added using Microsoft Paint at proposed turbine installation location and scales to approximate size. Turbine shaft 60m with blades 26.5m hence 86.5m (circa 270ft height).



Figure 1 St Nicholas House with 86.5m turbine visualisation to give sense of size



South Lasts 86.5m  
Application



St Nicholas House – 53m



Micro Power 10kw  
Turbines as already  
installed – 20.5m

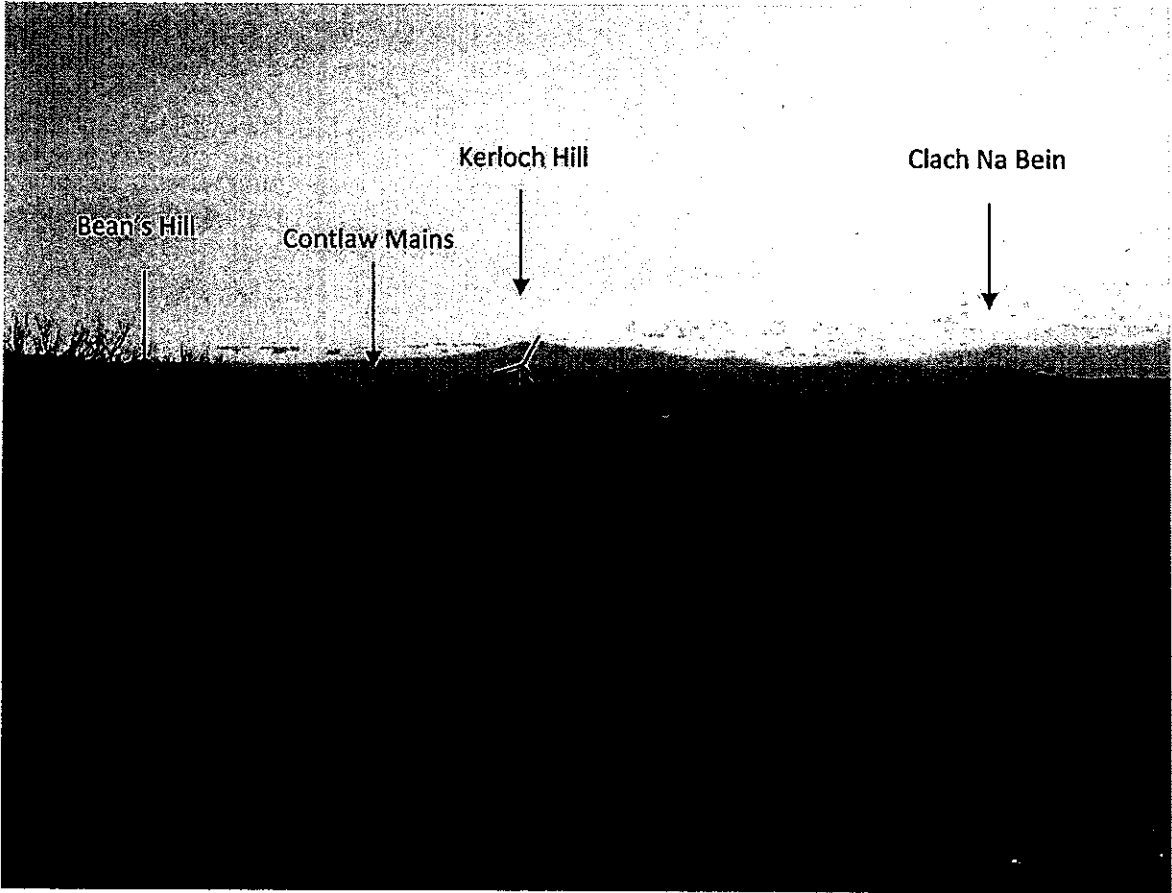


Figure 6: Looking South West from Black Top Woods at Forest Walk



Figure 7: Looking West from Lower Black Top woods

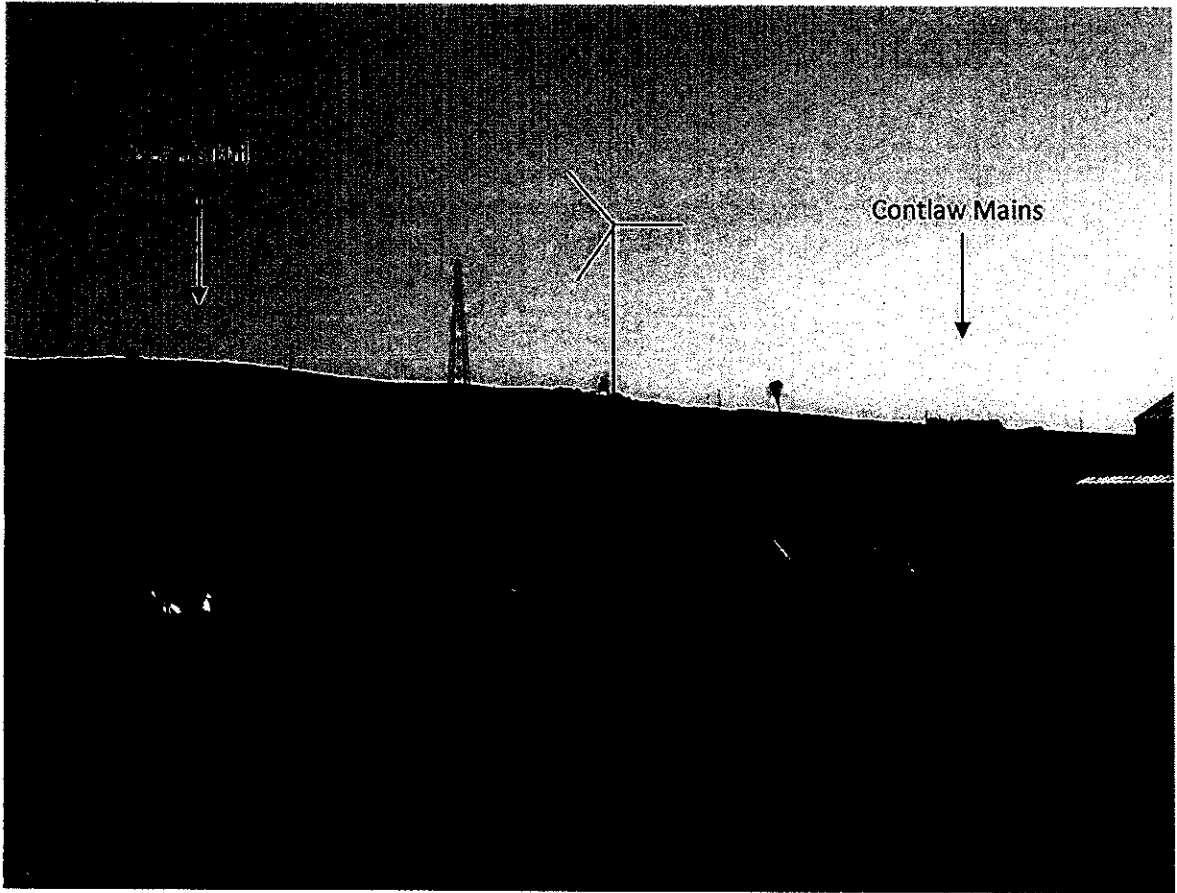


Figure 8: Looking South from East Brotherfield Livery

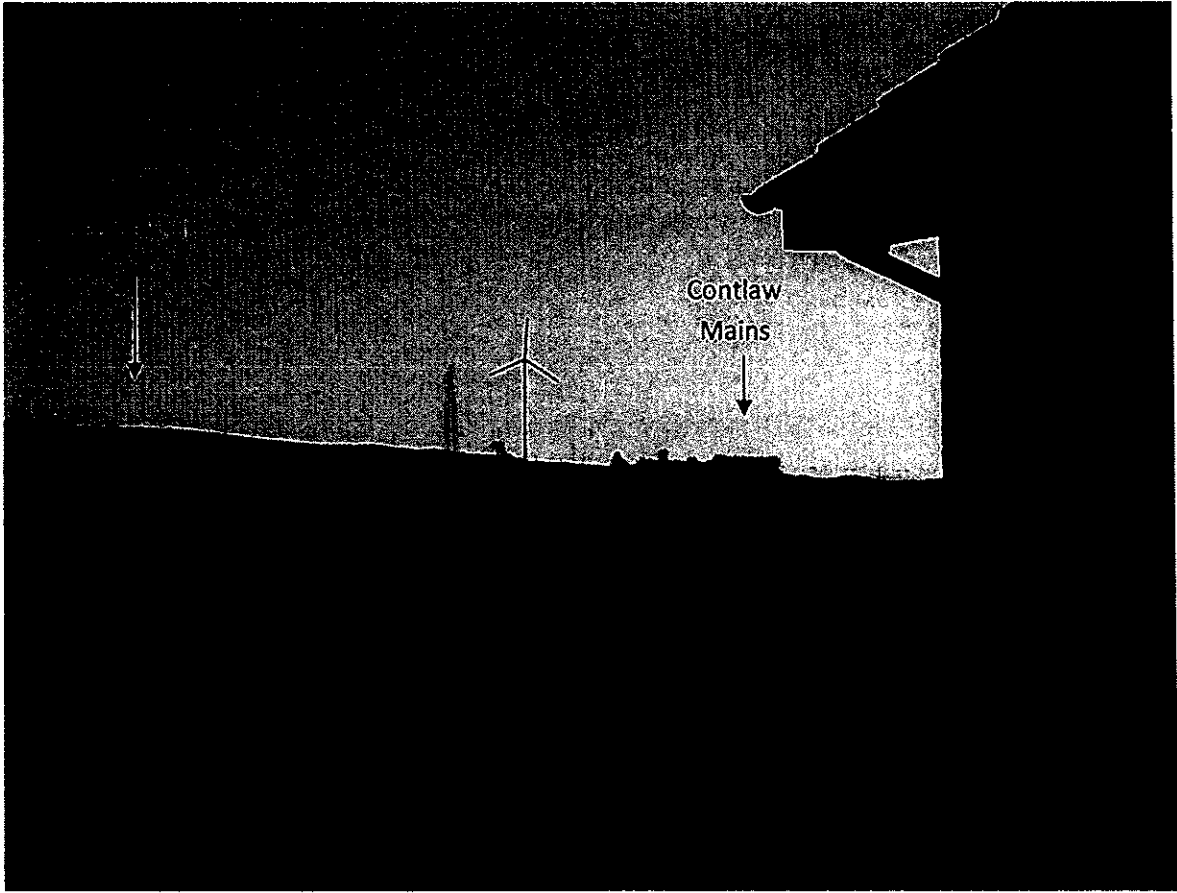


Figure 9: Looking South West from Forest Lodge

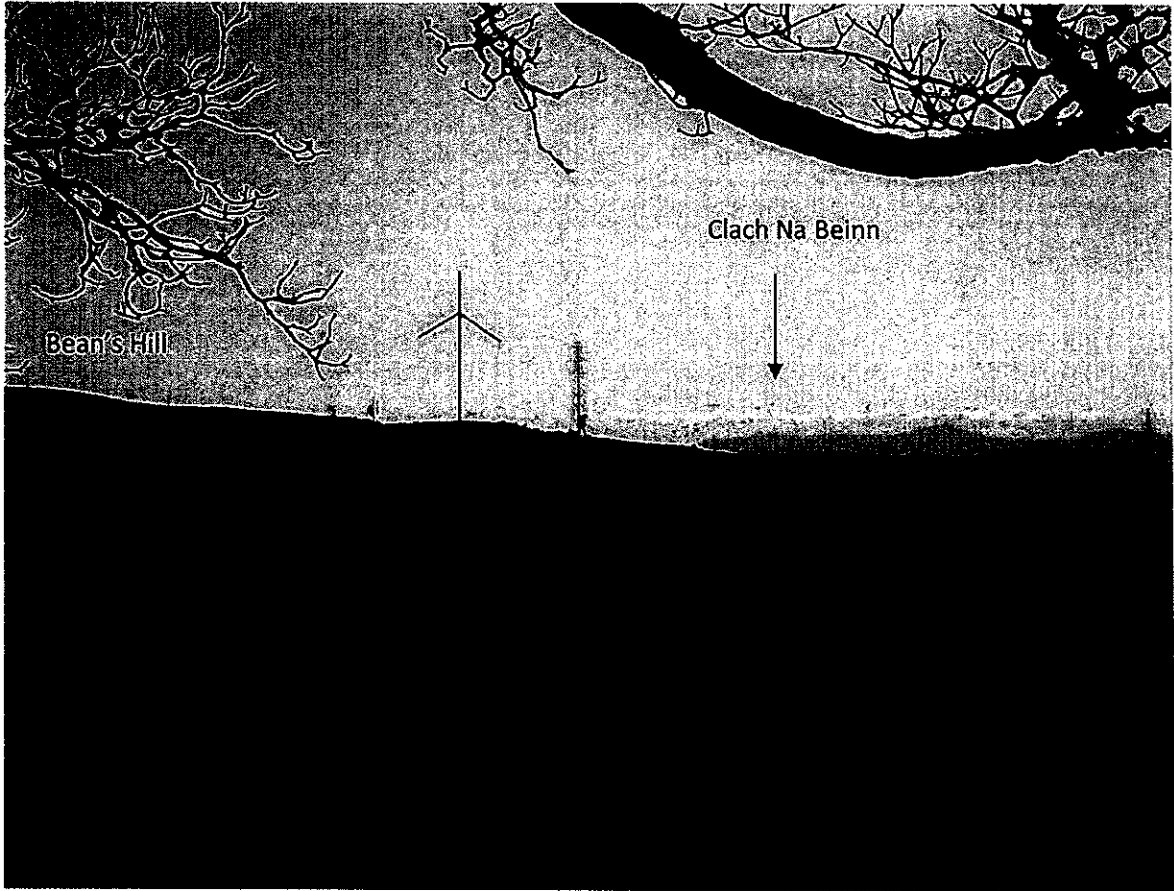


Figure 10: Looking West from the Rotten of Gairn

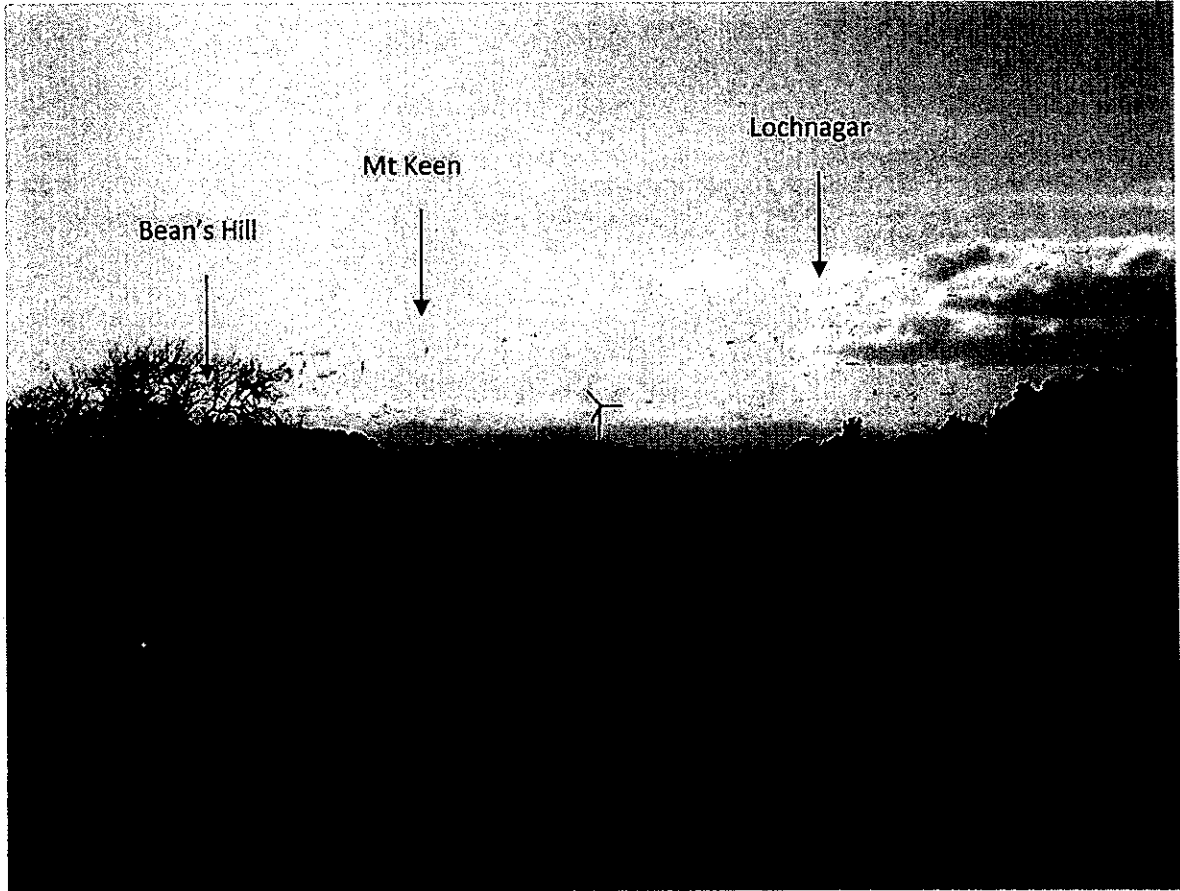


Figure 11: Looking West from Black Top



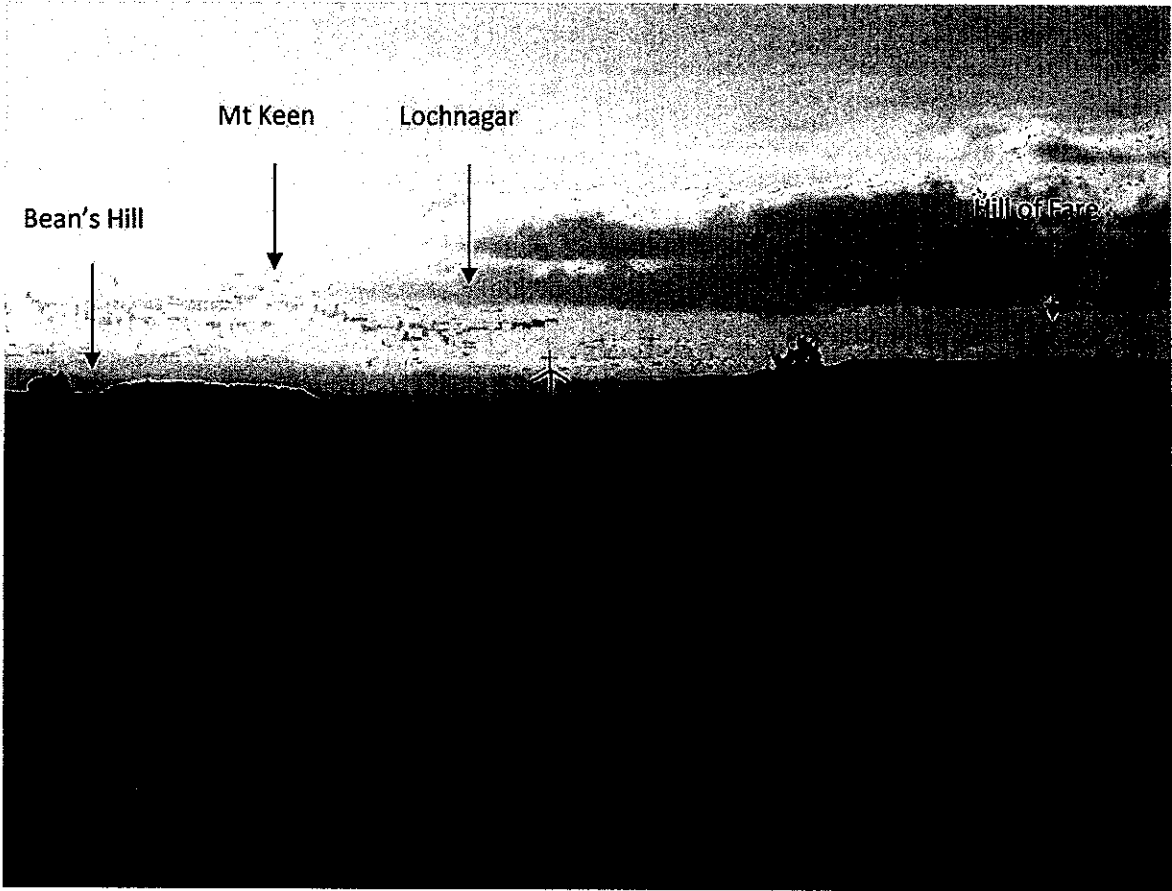


Figure 12: Looking West from the top of Baillieswells Road



Figure 13: Looking South from Tesco Petrol Station at Westhill

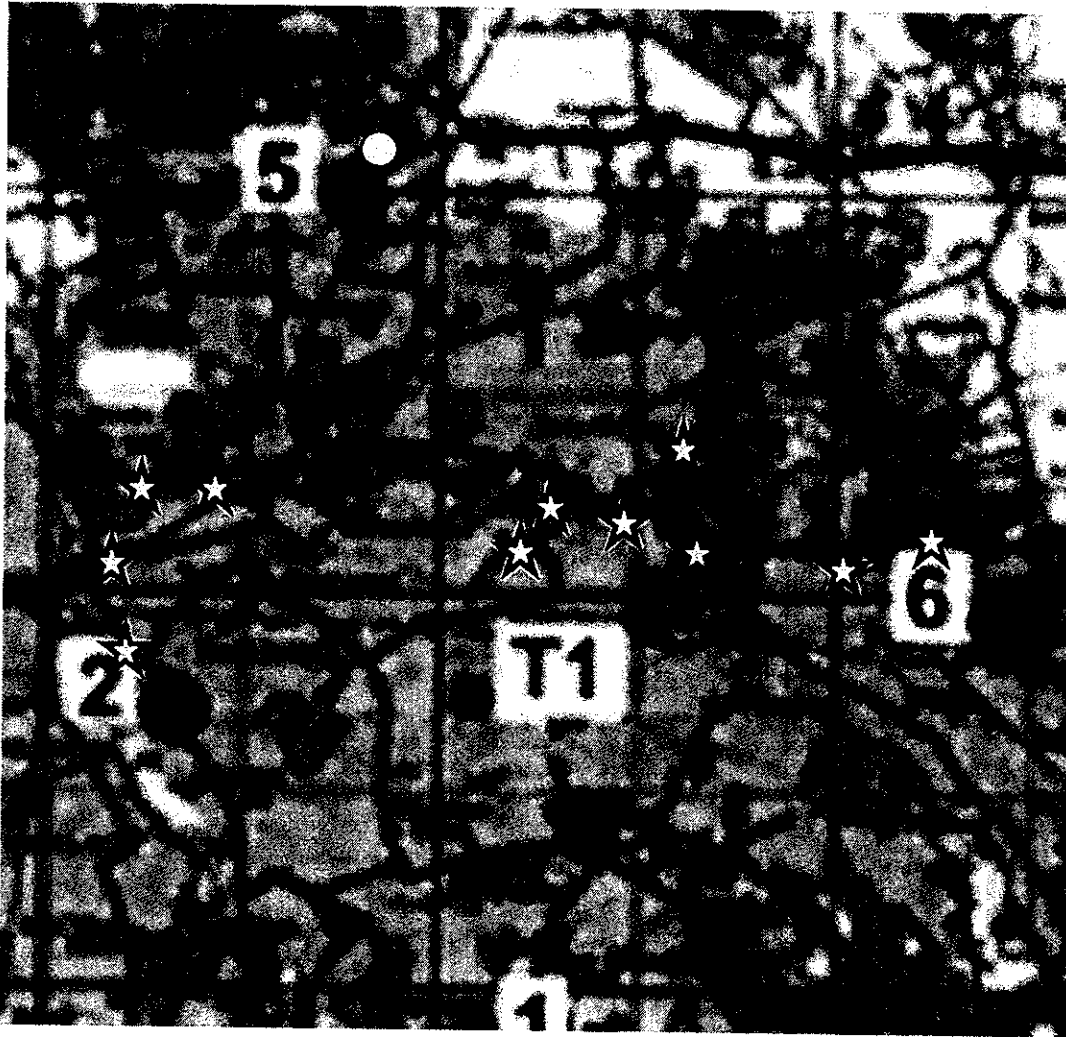


Figure 14

The images are from the locations at the yellow stars.

The red dots are the views presented in the planning application.

The yellow dot is at the Tesco Westhill Petrol station which is the perspective of Figure 12.

Thomas W. Brock  
Maplecrest,  
Cadgerford,  
Kingswells,  
Aberdeen.  
AB15 8SQ

8<sup>th</sup> April 2012

Planning Reference 120166

Local Authority Reference 000034591-001

Dear Sirs,

I am writing to Object to the above planning application for a Wind Turbine to be erected at South Last Farm, Contlaw Road, Milltimer, Aberdeen.

The application is for a Turbine which is 4 times bigger than the others on Bean's Hill will have a serious impact to all the surrounding areas by having a BLOT on the landscape.

I would like to know who gave you permission to "Publish" a picture of my house on your planning website as this will have an impact on the value of my property, but I do not think anyone considered the Devaluation of surrounding properties when this application was submitted.

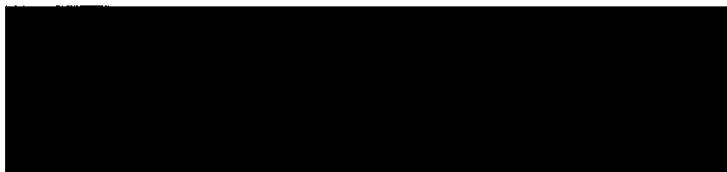
I currently have a magnificent view over the hills for many miles which is one of the main reasons for me living here, so can you please advise how the Council will compensate me for the loss of this view because of the Wind Turbine which sounds to me like the first of many Aberdeen Council are looking at.

Does this mean Aberdeen Council are going back on all their policies regarding Building on Greenbelt land.

I would really appreciate a written reply to this objection before I write to my MP.

Regards  
Thomas W. Brock

Viewpoint 5 permission for picture of my house.



From: <webmaster@aberdeencity.gov.uk>  
 To: <pi@aberdeencity.gov.uk>  
 Date: 10/04/2012 23:46  
 Subject: Planning Comment for 120166

Comment for Planning Application 120166

Name : George Simpson  
 Address : Aonachrigh  
 Kingswells  
 Aberdeen  
 AB15 8QQ

Telephone : [REDACTED]  
 Email : [REDACTED]  
 type :

City Development Services Leisure and Recreation	
Application Number	120166
RECEIVED	10 APR 2012
Date	
Caseworker	REF
Date Recd	11/04/12

Comment : Formal Objections to Planning Application Ref No P120166 for a Wind Turbine  
 By George A Simpson  
 Aonachrigh  
 Kingswells  
 Aberdeen  
 AB15 8QQ  
 10th April 2012

- 0.0 Introduction
- 0.1 As I am currently abroad it was only by chance that a neighbour alerted me to this planning application. I would also concur with the objections lodged by Gavin Price another member of the Silverburn Community.
- 1.0 Landscape Character/ Leisure / Viewpoint Assessment
- 1.1 A well established and visually appealing centre, a focus for public access i.e. the Forest Authority woodland. This is now seen as a recreational area by the Forest Authority, and Timber production is secondary.
- 1.2 The success of the Forest for recreation and the need for this access is shown by Forest Authority statistics on usage. Countesswells/ Rotten of Gairn/ Kingshill is the most frequently visited forest in the Aberdeen area. It is also the third most visited forest in Scotland. The Forest Authority runs outdoor events to educate the public about the forest and countryside, and to encourage outdoor recreation. There has been considerable financial investment by Forestry Enterprise in the provision of recreational facilities in these forests.
- 1.3 The views looking south overlooking the wide panorama over Royal Deeside and to the Cairngorms National Park from Gairnhill farm 125m elevation, Craiglug 153m, and indeed the whole of the Smiddybrae road and forest edge will be ruined by this huge and highly visible industrial scale object. It is significant no Viewpoint Assessments were demonstrated from this area. The presence of wildlife is a huge attraction to local people and to tourists. Wildlife and Landscape are known to be two of Scotland's main assets in attracting tourists.
- 1.4.1 It is noted that the Proposed Scheme creates loss of amenity for pedestrians cyclists and equestrians; that this is in conflict with the aims of legislation and planning guidance.
- 2.0 Green Belt/ Green Space Network
- 2.1 This industrial proposal is contrary to Planning Policy within Green Belt and more so in Green Space Network which would potentially set an undesirable precedent.
- 3.0 Wildlife & Habitat
- 3.1 The Silverburn Valley is an area 6 miles outside the western edge of Aberdeen with numerous public rights of way, forest walks and possessing a diverse range of habitat. This unique area supports a large and rich mix of flora and fauna including many endangered species in a beautiful setting which should be treasured as a unique, accessible and valuable asset to the Local Community, Citizens of Aberdeen and Scotland. This tranquil haven would be lost forever if this planning application is approved.
- 3.2 I am a keen bird watcher with a similar interest in the environment since childhood, a long term member of the RSPB and have been a resident in the Silverburn Community for 57 years
- 3.3 Since I was brought up in the area as a child from 7 years of age I am conscious of the changes that have taken place to the environment over the years. Farming practices have generally changed from a labour intensive activity to one relying on mechanical means. There is an

ever growing pressure on the sustainability of the wildlife dependant on a suitable food source and appropriate habitat to provide shelter and breeding opportunity.

3.4 As a child I can recall the area used to be a wilderness, rarely visited by the public. Black Grouse were present on the heather tops of Kingshill, Capercaillie in the Scots pines with the occasional Corncrake at Auchlea Moss during the summer. These endangered birds have now gone.

3.5 Biodiversity The Silverburn area includes District Wildlife Sites which are areas of Ancient Woodland and Wetland: The Moss of Auchlea, the Rotten of Gairn, and Moss of Rotten. In addition to these District Wildlife sites the inter-connectivity between Kingshill Wood, Gairn Wood, Silverburn Wood and the reserved greenspace of Beanshill creates an area of exceptional value in terms of wildlife diversity.

3.6 The Scottish Biodiversity List is a list of flora, fauna and habitats considered by the Scottish Ministers to be of principal importance for biodiversity conservation and is a tool for public bodies and others doing their Biodiversity Duty. The Silverburn Area contains animals, plants and habitats noted in the results of a survey important to the Scottish public as follows:-

4.0 Animals 1. Roe deer 2. Red squirrel 6. Badger 8. Otter 9. Butterfly 10. Robin

5.0 Plants 1. Heather 2. Scots pine 3. Bluebell/harebell 4. Oak 5. Thistle 6. Rowan 7.

6.0 Habitats 1. Hills and mountains 3. Woodland 5. Rivers and streams 9.

Farmland

7.0 UK List of Priority Species and Habitats is a list containing 1149 species and 65 habitats that have been listed as priorities for conservation action under UK Biodiversity Action Plan (UK BAP). The Silverburn Area contains birds, terrestrial mammals and herptiles (amphibians and reptiles) noted in the BAP list of a survey important to the Scottish public as follows with Species Action Plan (SAP) where noted :-

8.0 Birds Sky Lark (SPA), Common Linnet (SPA), Twite, Corn Bunting (SPA).

9.0 Terrestrial mammals Water Vole (SPA), Brown Hare (SPA), Otter (SPA), Harvest Mouse, Soprano Pipistrelle (SPA), Brown long-eared bat, Red Squirrel (SPA).

10.0 Herptiles (amphibians and reptiles) Common Toad, Pool Frog (SPA)

11.0 Bird Surveys.

11.1 It is apparent through the very limited survey undertaken significant information on breeding birds have not been recorded in the Ecology Report. Flocks in excess of 3,000 Pink Footed Geese and numbers of Greylag Geese have been recorded to feed and roost directly in the fields on the east side of Auchlea Moss. They are regularly present from late autumn through to spring and although numbers fluctuate it cannot be assumed that they will disappear altogether. The number of species recorded in the area greatly exceeds the numbers of Wintering and Breeding Birds noted in the Report. Some 70 wintering bird species and some 67 breeding bird species [compared to 11 breeding species noted]. The total number of species recorded in the area is 84 species comprising 15 Red, 30 Amber, 38 Green and 1 None listed status [compared to 22 species noted]. It can be seen from information in the North East of Scotland Bird Report with reference to the North East of Scotland Breeding Bird Atlas the high levels of breeding birds recorded in the Silverburn Sector. There are rook colonies adjacent to Silverburn House not mentioned in the report.

11.2 The insidious increase in wind turbine installations of this industrial scale together with limited research on their impacts on birds, all adds to the uncertainty of the affects on the steady decline of species.

12.0 Noise

The Silverburn area is presently an extremely quiet low populated area, consisting mainly of areas of Green Belt, Farms, Livery Stables, and Public Access Woodland used for Forestry and for Non vehicular Recreation. As a bird watcher it is crucial to be able to hear bird song or call to be able to identify the species and if possible its location. As far as the detrimental affect noise will have on habitat degradation over a wide area, the estimated noise levels generated by this huge wind turbine are not clear. The figures in the Report give up to 10M/s but the turbine is operational over 34 M/s. It is noted noise levels increase significantly with increase in wind speed. The exposed nature of the site leaves little opportunity to mitigate low frequency noise. The detrimental effects of noise on breeding birds, particularly Lapwings which are nocturnal during the breeding season and are in serious decline.

13.0 Construction Impact/Sustainability

The massive volume of concrete for the construction of the Wind Turbine base is not sustainable and as there is no mention of a ground investigation undertaken the design is limited.

17, Marchbank Road,  
Bielside,  
Aberdeen,  
AB15 9DJ  
28<sup>th</sup> March, 2012.

Planning Reception,  
Planning and Sustainable Development,  
Marischal College Reception,  
Broad Street,  
Aberdeen  
AB10 1AB

Dear Sir/Madam,

Application Reference: 120166  
Local Authority Reference: 000034591-001  
Proposal description: Proposed erection of a single 800kW wind turbine  
Location: Lower Deeside  
Address: South Lasts Farm, Contlaw Road, Milltimber, Aberdeen, AB13 0ES.

I wish to register my opposition to the above proposal. I am a keen walker, and frequently use the right of way adjacent to the site for this proposed development. I view with growing concern the impact that wind turbines are having on our environment generally, and on this location particularly.

This development would certainly adversely affect the character and amenities of the surrounding landscape and would also impose greatly on adjacent residential properties. It would be 86.5 metres in height, making it considerably higher than St Nicholas House. It would therefore completely dominate the surrounding countryside, and in so doing, would contravene the spirit of Policy 22: Energy and Development, of Aberdeen Local Plan 2008.

Furthermore, I cannot visualise this proposal as being essential for uses in agriculture, woodland and forestry. I cannot perceive it as being associated in any way with recreational uses compatible with an agricultural setting, mineral extraction or landscape renewal. In other words, it would fly completely in the face of Policy NE2 – Green Belt, of Aberdeen Local Development Plan 2012.

As a lover of the countryside and of the amenities provided by the Green Belt, I rely on Policy NE9 of Aberdeen Local Development Plan 2012 to protect my interests, and safeguard existing recreational facilities. It should be your responsibility to do so.

I therefore regard this exercise as a money saving /making exercise on the part of the applicant at the expense of his neighbours, and of others like myself who enjoy the beauties of the countryside.

If national and local government are serious about using this method to help generate Scotland's electricity, then they should pursue with vigour the establishment of off- shore wind farms, where there can be no valid claim that they have a negative impact on the environment, and that includes the owner of a certain golf course.

Yours' F



Tom Scotland



**From:** GW H [REDACTED]  
**To:** <pi@aberdeencity.gov.uk>  
**CC:** [REDACTED]  
**Date:** 01/04/2012 19:51  
**Subject:** F.A.O. Dr Margaret Bochel and Robert Forbes  
**Attachments:** Wind Turbine Application.docx

FAO: Dr Margaret Bochel

Please see attached our objection to the wind turbine at South Last Farm, Milltimber, Aberdeen.

Regards

Gerald and Heather Hyett

Ref: GWH/HBH/PT/SLF  
House

North Westfield

Silverburn  
Kingswells  
Aberdeen  
AB15 8QN

Telephone: [REDACTED]

[REDACTED]  
Email: [REDACTED]

Date: 31 March 2012

Your Ref: REF/P120166[ZIA]  
Contact: Robert Forbes  
Email: [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk)  
Direct Dial: [REDACTED]  
Direct Fax: [REDACTED]

Planning & Sustainable Development  
Enterprise, Planning & Infrastructure  
Aberdeen City Council  
Business Hub 4  
Ground Floor North  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

FAO: Dr Margaret Bochel  
Head of Planning and Sustainable Development

**Subject: The Town and Country Planning (Scotland) Act 1997**  
**South Lasts Farm, Contlaw Road, Milltimber Aberdeen**  
**Proposed Erection of a Single 800Kw Commercial Wind Turbine,**  
**Associated Ancillary Equipment and Access Track**

**Applicant R & B Renewables on behalf of Joseph Dow**  
**Application Ref: P120166**  
Local Authority Reference: 000034591-001

Acknowledge receipt of your letter dated 22 March 2012 duly noting the contents therein. Respond as follows:-

In response to my email questionnaire quite frankly the penultimate and latter contents of your letter beggar's belief! I would be interested to know how one is expected to know about a proposed planning intent, particularly when one is likely to be affected. Surely one has the right to be consulted. Now that I have acquired the information previously requested by other arrangements, I request that my questionnaire submitted to your department via email dated 20 March 2012 to Robert Forbes, be withdrawn. I certainly did not want this to be placed for public perusal.

In accordance to the European Court of Human Rights, one has the democratic right to obtain information where ones property is likely to be affected. It was only by chance via email while here

in the Cote d' Azur that I learned of this proposed planning application.

I now submit my objection representation against the above-mentioned proposed planning application. See attached page 2.

With regard to the date that objections have to be rendered by, from the information I have been given it is not clear which date is applicable. At the time a visit was made by an interested party on my behalf to your planning department, they were told by your representative, that the planning application was registered on the 19 March 2012 and it was to be advertised on Wednesday 28 March 2012. Objections had to be in by Wednesday 11 April 2012. (14 days notice). The residents within the area who are likely to be affected, have been given forms which state that objections have to be in by 4 April 2012. Kindly clarify this.

Having now perused the documents submitted by SAC Consulting in Edinburgh they lack important technical data. It certainly does not conform to the requirements as stated in EU Best Practice Guidelines for Wind Energy Development (European Wind Energy Association) established in 1982 as a professional body conversant with wind energy in research and development. The United Kingdom including Scotland are expected to comply to this Directive.

I fully endorse the objections raised and submitted by our neighbour Gavin Prise who has compiled a more detailed document than your appointed consultants SAC Consultancy in Edinburgh.

Once again the cart before the horse, a similar scenario to the AWPR and Trump Development, whereby alternatives transport infrastructures and legislation, directives have not been considered or over-ruled. Feasibility and Environmental studies have not been taken within the Beanshill area. It is known that the area where it is proposed to site the wind turbine, the green belt land has never been researched fully. The land from a geographic point, as recorded in geology maps is prone to poor drainage, aquifers/artesian wells and protective historical medieval sites.

It would appear that where the Scottish Government specify major projects to be considered as of national importance, that the public's point of view is not taken into account. Aberdeen is getting to be known as the city having the reputation of being lead by developers and planning directives follow after. It is the planner who designs the layout of a city not a developer.

I now submit our Objection Submittal to the above-mentioned subject for reasons as depicted in attachment page 3:

Gerald W Hyett & Heather B Hyett

**The Town & Country Planning (Scotland) Act 1997  
Location South Lasts Farm, Contlaw Road, Milltimber Aberdeen  
Proposed Erection of a Single 800Kw Commercial Wind Turbine  
& Associated Ancillary Equipment & Access Track**

**Applicant G & B Renewables for and on behalf of Joseph Dow  
Application Reference:P120166  
Local Authority Reference:000034591-001  
My Reference: GWH/HBH/PT/SLF/WT**

**Objection Submittal as of 31 March 2012 referred to as:-**

- SAC Consulting documents not in accordance to EU Directives (European Best Practice Guidelines For Wind Energy Development (European Wind Energy Association).
- Not in accordance with the Aberdeen City Local Plan Green belt classification NE 2 whereby it does not permit development, other than those essential for agriculture, woodland/forestry and recreational purposes.
- Poor drainage, peat zones and likely to be aquifers present.
- Requires hydrological assessment and geological investigation.
- Detrimental effect on landscape character of the area.
- Inappropriate site for wind turbine in proximity to North Westfield House (551m) due to land profile.
- Proposed size dominant and overbearing for nearby residents. I note that the proposer's distance is 728m from the wind turbine to South Lasts Farm. I see no constructive reason why the proposed wind turbine if built, could not be sited nearer to the proposer's dwelling.
- Danger to wildlife, fauna and flora.
- Non compliance to EU Directive 85/337 Environmental Assessment (SEA). Habitat Directive Natura 2000.
- Visual Impact-landscape topography perception.
- Interference with telecommunications, satellite broadband-electromagnetic –electronic systems.
- Noise Impact emissions-aerodynamic noise from turbine blades-climatic conditions.
- Likely flickering shadowing effect by the sun activated by the turbine blades in motion.
- Noise impact generated by mechanical noise from gear box and generator
- Non consultation or dialogue with residents likely to be affected by the wind turbine installation.(EU European Best Practice Guidelines For Energy Wind Development) clause:2.4.2.
- Site visit and establish known historical records.
- Establish if current marketable value of properties will be affected.
- Interference to natural private water supply to properties.

Development Management Team  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen AB10 1AB

1<sup>st</sup> April 2012

Dear Sir/Madam

**Formal Objection to Planning Application Ref 120166 – Wind Turbine at South Lasts Farm**

It has been brought to my attention that the above planning application has been lodged and that any formal comments with regards to this application are to be received by 4<sup>th</sup> April 2012. As one of the properties which will be nearest to this wind turbine if it is erected we have strong objections to the installation of such a turbine and have summarised below the reasons for this objection.

**1 – Non compliance with Council Greenbelt Policy**

*“No development will be permitted in the green belt for purposes other than those essential for agriculture, woodland and forestry, recreational uses compatible with an agricultural or natural setting, mineral extraction or landscape design”*

In reviewing the application it does not appear to be ‘essential’ for the reasons stated above or purely for ‘recreational’ use in the areas detailed. We fail to see how a wind turbine of this size is required for ‘recreational’ use.

The applicant has stated that an exception should be made to this policy on the basis that:

- The proposal will reduce the environmental effect of the existing (agricultural) activity by offsetting the use of carbon dioxide derived energy
- The development is small scale
- The intensity of the existing agricultural activity will not be increased

The turbine requested has a total height of 86.5m which cannot be considered small scale as per bullet point 2. Aberdeenshire Council’s guidance for assessing Wind Energy Developments clearly provides guidance on size as detailed below and this shows that this application is in fact for a large wind turbine.

*In a rural environment wind turbines should be classified as follows:*

*Large >50m+to hub and/or >80m to tip*

*Medium 30-50m to hub and/or 48-80m to tip*

*Small <30m to hub and/or <48m to tip”*

## **2 – Impact on the Landscape**

My understanding is that Aberdeenshire council has clear guidance on wind energy developments as stated below:

*“Proposals for a wind energy development should avoid being sited on prominent ridgelines, hills or sensitive skylines”*

The application infers that this site is not a prominent location however we strongly disagree with that. This location is a ridgeline and a hill and can be seen from a number of different points throughout the countryside and surrounding towns (this is supported by Mr Gavin Prise' submission).

## **3 - Environmental Impact**

The applicant claims they have carried out an environmental study however we are aware that they have not accessed the neighbouring land nor have they requested access to carry out such a study. Therefore any study that has been carried out cannot be full and thorough and cannot have taken into account the wildlife in the area. We strongly believe there will be a negative environmental impact and would request that as a minimum a full and extensive study is carried out before any decision is made.

## **4 – Noise**

Having had limited time to fully research this issue we cannot provide figures with regards to noise output however it is clear that the noise impact from a turbine of this size will be detrimental to all neighbouring properties and the other individuals who use the countryside.

I do not believe that a full study has been carried out into the noise impact on both neighbouring properties and what it will do for those who enjoy using this area of greenbelt for recreational purposes. A large number of individuals use this area for walking, running, cycling and horse riding on a daily basis and we strongly believe that the turbine will have a negative impact on these users. With regards to horse riders in particular it is likely that it will scare many horses and therefore people will no longer be able to safely use this area for that purpose.

In addition I would like to express my concern that we were not formally advised of this application. Due to the size and nature of the application we were surprised to find this out through a neighbour only 3 days prior to the final date of submissions.

Yours sincerely



Jenny and Kenny Murray

**From:** Ashleigh Kinch [REDACTED]  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 4/3/2012 1:23 pm  
**Subject:** Objection to planning application ref 120166  
**Attachments:** Objection.docx

Dear Sir / Madam, I attach our formal objection to planning application ref 120166, for the erection of a wind turbine at South Lasts Farm, Milltimber. I would be most grateful if you could acknowledge receipt of the above document. Kind regards, Ashleigh Kinch

Kinch Enterprises (Farms)  
Westfield Lodge  
Contlaw Road  
Milltimber  
AB13 0JL

2 April 2012

Development Management Team  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen AB10 1AB

**Objection to Planning Application Reference 120166**

Dear Sir/Madam,

We would like to lodge a formal objection to the planning application to erect a 800 kW 86.5m wind turbine at South Lasts Farm (Planning Application reference 120166).

Our objection is based on:

Inaccuracies and omissions contained within the application and supporting documents – with particular reference to;

- i) Environmental and ecological considerations
- ii) Impact on neighbouring properties

We also wish to express our disappointment that such a planning application, i.e. an 86.5m turbine installation within the City, was to be processed without adjacent property owners, being directly informed or consulted. As a neighbouring land owner it was only by chance that we heard about this specific application.

As we were not consulted or informed and only became aware of this application last week, we have had insufficient time to gather additional information which may be needed to test the assertions of the applicant relating to noise levels in particular, which have been assessed on the basis of multiple assumptions and adjustment – seemingly to support the application with little regard for the true impact on neighbouring residents.

The applicant has referred to the development as 'small scale' – this is inaccurate, misleading and seeks to minimise the potential impact of an enormous industrial scale wind turbine in a highly visible and sensitive rural area.

- i) Environmental and Ecological considerations

The environmental report contained within the supporting document for the application whilst it may appear comprehensive, we feel suffers from several important inaccuracies and omissions.



We would like to express our surprise that the survey officer who prepared the report stated that no access could be taken to the deer fenced area to the south of the application site, an area which is within our ownership and sits less than 10 metres from the proposed site and access track. Although this area is deer fenced, there is pedestrian access at two points to the enclosure and vehicle access could also have been arranged at any time had the applicant informed us the survey was taking place.

As the entire area to the south, immediately adjacent to the proposed site has not been properly surveyed we would assert that the environmental report carries little weight, omitting as it does such a large, and habitat rich environment surrounding the proposed site.

#### Badgers

In the supporting statement an environmental report has been commissioned by the applicant which states that there is no evidence of badger activity within 100m of the proposed site. In fact there are very high levels of badger activity in the immediate and surrounding area.

There are two active setts immediately adjacent to the proposed site, one less than 30m from the proposed turbine & track at grid ref NJ84117 03451 and one less than 50 metres away at grid ref NJ84154 03449.

#### Birds of Prey / Raptors

Whilst the environmental report submitted by the applicant refers to the use of the site by birds of prey such as Red kite, we do not feel a true representation of the potential impact of the proposed turbine has been given.

Beanshill is an area of predominantly unimproved heathland which provides excellent habitat for the prey of raptors and provides an important hunting area for the species present in the area.

Although some species were recorded in the environmental report, no mention was made of Sparrowhawks and Goshawks, both of which are observed regularly hunting over the site of the proposed turbine. In particular there is strong evidence (droppings and plucking posts) of the area being used by Sparrowhawks for hunting and feeding.

The potential impact of such a turbine on these species is great, and we do not feel has been adequately assessed.

It would also seem that such an application so close to the release site for Red Kite at Peterculter should have included the RSPB in the consultation process.

#### ii) Impact on Neighbouring Properties

##### Hillhead of Contlaw

This property sits just 375 metres from the site of the proposed turbine, and has not been referred to or considered by the applicant in their supporting document, despite being the closest property to the site. Although currently unoccupied, this property has full planning consent (planning ref 101472) and building warrant for renovation and extension to form a dwelling. Obviously this property will be occupied once renovated, is currently in the

tendering stage and as such must be considered in the assessment of impact on neighbouring properties. The illustration included with this letter demonstrates the relative proximity of this property to the turbine site.

Noise

The report commissioned by the applicant shows predicted noise levels at Contlaw Mains exceeding the approved levels. Only once 'background noise' has been factored in, do the levels fall (just) below approved levels. Despite this, no readings to assess current background noise at Contlaw Mains have been taken; rather the 'assumed' levels were based on readings taken at a completely different location.

As a quiet residential site in a rural area some distance from any major roads we feel that background noise levels at Contlaw Mains may well be significantly less than asserted and as such would not minimise the noise of the proposed turbine as the applicant has stated, meaning that approved noise levels would in fact be breached.

In addition to this, and as stated above, no consideration of the property at Hillhead of Contlaw has been made. As the closest property to the proposed turbine by quite some margin, it would be sensible to assume that if noise levels at Contlaw Mains are assessed to be 'borderline' at best, noise levels at Hillhead of Contlaw would drastically exceed approved levels.

In conclusion we believe that this proposal represents an inappropriate and highly damaging development within the greenbelt of Aberdeen City.

Yours sincerely,

Ashleigh Kinch

Kinch Enterprises (Farms)

**From:** "John McIntosh"  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 09/04/2012 20:49  
**Subject:** Objection to Planning Application 120166  
**Attachments:** Objection.pdf

Dear Sirs,

Please find attached electronic copy of the objection from my wife and I to the above application.

Original copy will be posted.

Regards,

John McIntosh

J & C McIntosh

East Brotherfield

Kingswells

Aberdeen

AB15 8QN

Tel

East Brotherfield  
Kingswells  
Aberdeen  
AB15 8QN  
9<sup>th</sup> April 2012

**Development Management Team**  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Dear Sirs,

**Objection to Planning Application Ref: 120166**

**800kW Wind Turbine at South Lasts**

I would like to draw your attention to the following key aspects of the above wind turbine application. I fully understand that you will be well aware of these aspects but I believe it helps to set in context my specific objections which I provide in detail in the following pages:-

- If approved this will be the largest wind turbine within Aberdeen City by some margin, both in terms of electrical output and physical size.
- The turbine will be situated close to the top of Beans Hill which is a visible landmark in Lower Deeside, particularly when approaching the city from the west along the Dee Valley.
- The turbine will be situated within Aberdeen City Green Belt.
- The turbine will be very close to 3 existing 10 kW micro turbines, each of height 20m.
- The turbine will be sited less than 2000 metres from the edges of Milltimber and Peterculter.

**Scale of Development**

To enable assessment of the proposal against national and local government policies and other guidance documents it is important to define the size of the development.

In the absence of suitable definitions within the Aberdeen City Local Development Plan please refer to the extract below from "The Use of Wind Energy in Aberdeenshire Part 1 Guidance for Developers 2005".

*2.5 Aberdeenshire Council believes that it is useful to classify turbines into a number of categories depending on the size of the turbines and the number of turbines in one development. This allows consistent application of policy and ensures that all*

*stakeholders know exactly what is meant by some of the descriptions used:*

*Single (Domestic): 1 Turbine of installed capacity less than 0.25MW*

*Single: 1 Turbine of installed capacity between 0.25MW and less than 3MW*

*Cluster: 2-3 turbines or installed capacity between 3MW and less than 6MW*

*Small scale: 4-10 turbines or installed capacity between 6MW and less than 16MW*

*Medium scale: 11-20 turbines or installed capacity between 16MW and less than 31MW*

*Large scale: 21 or more turbines or installed capacity greater than 31MW*

*2.6 Given the current position of the turbine sizes available, it may be reasonable to categorise turbine sizes into small, medium and large.*

*2.7 Perceived size will vary according to whether a turbine is in an urban or rural context. In a rural environment wind turbines should be classified as follows:*

*Large >50m+ to hub and/or >80m to tip*

*Medium 30-50m to hub and/or 48-80m to tip*

*Small <30m to hub and/or <48m to tip*

*2.8 In an urban environment, the hub height of a wind turbine will have a greater impact than in a rural environment. Turbine technology has advanced rapidly and turbine heights are now much greater than they used to be, and are likely to further increase. Therefore, wind turbines should be classified as follows:*

*Large >40m+ to hub and/or >65m to tip*

*Medium 20-40m to hub and/or 32-65m to tip*

*Small <20m to hub and/or <32m to tip*

*Note: As a design principle, it is desirable that where a wind energy development already exists nearby (depending on topographical features) a similar scale and design of turbine is proposed.*

The proposed South Lasts turbine would therefore be classified as a **large single turbine** and would be “non-domestic” – i.e. commercial

### **Grounds for Objection (1) - The Turbine is Situated within the Green Belt**

In the following sections paragraph numbers in italics refer to the corresponding paragraphs in the applicant's document titled "Supporting Information". Quoted extracts from this document and other relevant documents are also shown in italics.

#### ***1.7.2.2. The Aberdeen City Local Plan 2008***

In this section the applicant comments on Policy 22 of the plan as follows:-

*The proposed wind turbine development site is also within an acceptable area for such development as indicated by Policy 22 of the Local Plan. Arising from the assessments undertaken and reported on in this report, it is considered that the site meets criteria for inclusion within Tier 4 of Policy 22 due to the land classification 4.2 of the Soil Survey of Scotland. Also, as the development is planned to use only 0.27 ha, the loss of agricultural land is not considered to be a major concern.*

#### **Objection**

Aberdeen Local Plan 2008, Policy 22 is unequivocal in limiting the location of a large scale turbine to a Tier 4 area or in exceptional circumstances to a Tier 3 area. Appendix 1 of the plan clearly states that Green Belt falls within the Tier 2 category. In paragraph 1.7.2.2 of his supporting information he has attempted to justify the location as being within a Tier 4 area by virtue of land classification arising from a national soil survey. This has nothing to do with defined green belt and is a completely spurious claim.

#### ***1.7.2.3. Aberdeen Local Development Plan, (As modified 2012)***

Aberdeen Local Development Plan 2012, Policy NE2 states:-

*No development will be permitted in the green belt for purposes other than those essential for agriculture, woodland and forestry, recreational uses compatible with an agricultural or natural setting, mineral extraction or restoration or landscape renewal.*

*The following exceptions apply to this policy:*

*1. Proposals for development associated with existing activities in the green belt will be permitted but only if all of the following criteria are met:*

- a) the development is within the boundary of the existing activity.*
- b) the development is small-scale.*
- c) the intensity of activity is not significantly increased.*
- d) any proposed built construction is ancillary to what exists.*

In paragraph 1.7.2.3. of his supporting information the applicant attempts to claim an exception as follows: -

- *The proposal is associated with the agricultural activities currently carried out on the site and surrounding land.*
- *The proposal will reduce the environmental effect of the existing activity by offsetting the use of carbon derived energy.*
- *The development is small scale.*
- *The intensity of the existing agricultural activity will not be increased.*

### **Objection**

I believe this to be a false claim –

- The proposal is clearly a financial investment based on the Feed in Tarrif incentives on offer from the government and is made feasible for the applicant since he owns the land.
- The proposal is not essential for agriculture nor is it associated with the agricultural activities currently carried out on the site. The electrical output from the 800 kW turbine will be far in excess of the electrical power requirements of the farm and will feed directly into the 1100V grid network. Consequently all of the electricity generated will be exported and will not be used on the farm.
- The development is not small scale.

**On the basis of Green Belt issues alone I believe the planning application should be refused.**

### **Grounds for Objection (2) - Failure to Carry Out an Adequate Landscape and Visual Impact Assessment**

From his list of references the applicant correctly identifies the main receptors and indicates how the choice of viewpoints was made as follows: -

#### ***5.2.6. Receptors***

*Landscape receptors will comprise the landscape fabric of the site and all landscape character areas and designated landscapes which are predicted to have potential views of the proposed Development.*

*Visual receptors will comprise those individuals or groups of people who may have views of the proposed Development. The main groups of visual receptors are usually defined as follows:*

- *Residents;*
- *Tourists or visitors, which includes users of outdoor recreational facilities including strategic recreational footpaths, cycle routes or public rights of way whose attention would be focused on the landscape; important landscape features with physical, cultural or historic attributes; principal views from residential buildings; beauty spots or picnic areas;*
- *Hill walkers, which includes those walking on unmarked footpaths; and*

- *Road and rail users.*

#### **5.2.7. Viewpoint Assessment**

*A selection of viewpoints has been chosen following the Screening Request stage of the consultation process. These viewpoints are considered to be representative of the main landscape and visual sensitive receptors in the study area for the purposes of assessing the proposed Development.*

#### **Objection**

Having correctly identified the main types of receptor it is my contention that the applicant fails to include most of these receptors within his subsequent choice of viewpoints and in his analysis.

The viewpoints chosen have been limited only to the key viewpoints suggested by the planning department in the Screening Opinion. No viewpoints have been chosen to represent residents, visitors, or recreational users. Nor have any viewpoints been included from nearby identified green spaces with high visual amenity such as Gairnhill and Kingshill Woods.

#### **5.3.2. Landform and Hydrology**

##### ***Landcover, Land Use and Landscape Elements***

#### **Objection**

No mention is made of the large scale coniferous forests to the north east of the location within 2000 metres - namely Gairnhill, Kingshill and Counteswells Woods.

#### **5.3.3. Settlement**

In this paragraph the applicant comments as follows:-

*Overall, with the exception of the highland foothills the study area is well settled, with the principle settlement of Aberdeen city providing the nucleus of settlement growth. A number of small scale settlements radiate out from Aberdeen, those with theoretical visibility of the proposed Development include:*

- *Westhill (3.2 km north north west);*
- *Bieldside (3.2 km west north west); and*
- *Kirkton of Maryculter (4.5 km south west).*

*The nearest residential cluster to the proposed Development which is predicted to have visibility would be Easter Ord which is situated in excess of 1.2 km north north west and Blacktop (1.9 km north east).*

#### **Objection**

The applicant has not included the settlements of Peterculter and Milltimber which are the closest main settlements to the proposed development. The proposed development is less than 2000metres from the edge of each of these settlements which is not in accordance with the guidance in SSP 2010 paragraph 190.



Within the statement of residential clusters the applicant has not identified the Silverburn area. This area is distinct from Easter Ord and Blacktop and has a total of 12 houses with distances from the development ranging from approximately 500 metres to 1500 metres. This area is closest to the development to the north and has a comparable or greater number of residences than either Easter Ord or Blacktop with most of the houses having an uninterrupted view of the proposed development – in many cases this will be a skyline view. This is a significant omission from the applicant's visual impact assessment (VIA).

To the south east of the development is a cluster of houses at Upper Beanshill within 900 metres of the development. The nearest house to the development is shown as 506 metres on the application drawing No 11792-003. This is within 10 rotor diameters of the turbine. This is not in accord with Policy R8 of the Aberdeen Local Development Plan 2012.

#### *5.3.4. Recreation*

##### **Objection**

The applicant has limited his analysis to core paths, aspirational core paths and national cycle routes and has not considered the important path and right of way running from Blacktop to Contlaw. This path is used regularly by walkers, cyclists and horse riders and has been signposted as a "Public Footpath" at various points along its route by the applicant himself. The path will be approximately 500metres from the development at its nearest point and the turbine will have a major impact on the views from this path along its entire length – approximately 3000metres. The path is used on a daily basis by horse riders from the East Brotherfield livery yard and by riders from other livery yards throughout the area. In addition to having a significant effect on visual amenity for these users, the proposed turbine will potentially have a major effect from a health and safety perspective, since the likelihood of horses or ponies being "spooked" by the appearance and action of the turbine cannot be ruled out. This could result in a horse, in particular a young horse, rearing or bolting with possible injury to its rider. If the proposal is consented it is highly probable that this will deter many horse riders from using the route and consequently could influence the viability of the livery yard.

#### *5.3.5. Transport*

##### **Objection**

The AWPR has not been included in the applicant's assessment. This major route will be approximately 600 metres to the east of the proposed development and runs across the Silverburn valley on top of an embankment which will be up to 12metres high. At either end of the embankment the road will be in a shallow cutting. As drivers leave the cutting they will have a sudden clear view of the wind turbine. This is obviously a potential driving hazard and is a significant omission from the application.

### 5.7.1. Analysis of the Zones of Theoretical Visibility (ZTVs)

#### Cumulative ZTVs

##### Objection

The applicant has failed to consider the cumulative effect of the three 20metre high turbines situated at Upper Beanshill at a distance of 500metres from the proposed development. Although lower in height than the proposal these existing turbines are clearly visible on the skyline when viewed from the north, along the length of the Silverburn valley, the area that is most severely affected by the proposal. It is contended that the cumulative effect should have been considered, is substantial, and is a significant omission from the applicant's Visual Impact Assessment.

It is worth noting that when the planning application for these 3 turbines was approved in 2011 one of the considerations was that these turbines were small enough in scale not to be considered a commercial development. (ref. Aberdeen City planning application No 110317). The same cannot be said for the current large scale proposal.

#### Settlements

The application comments as follows:-

*Easter Ord: The ZTV predicts visibility from this residential cluster. The actual views from the majority of the properties are enclosed views due to trees surrounding properties and the watercourse which drains to the Ord Burn. Overall, the actual views towards the proposed turbine would be restricted and filtered with the turbine appearing prominent above the horizon in the context of a series of electricity pylons which appear in the immediate setting.*

*Blacktop: Situated on south facing slopes, the properties which combine to form this residential cluster vary in character consisting of single and two storey detached houses oriented north/ south facing. The ZTV predicts the entire residential cluster would have views of the turbine visible above the horizon. Actual views however would be experienced by a limited number of oblique views from residents to the west where no lines of trees obstruct views.*

##### Objection

Again there is no mention specifically of the Silverburn area which would have the most prominent skyline views. (see objection to 5.3.3 above)  
In addition the applicant has attempted to lessen the impact at Blacktop by reference to oblique views from this location. This is misleading as most of the properties have been designed to offer views along the valley to the west since this encompasses excellent views of the Dee Valley including views of Lochnagar and the surrounding mountains. The proposed turbine will compromise this vista and will have a substantial impact on the landscape as viewed from this location.

Over the wider area to the north encompassing Wester and Easter Ord, Silverburn and Blacktop there are approximately 50 residences, most of which will have a clear view of the turbine.

Relevant guidelines for receptors specify residential buildings to be in the “high sensitivity” category. The magnitude of change for the majority of residential receptors to the immediate north of the proposal will be “substantial”. The visual impact on these residences will therefore be classified as **Major** (see photomontages at the end of this letter).

**It is contended that the applicant has misrepresented the number of houses within the settlements to the north of the proposal and has grossly understated the visual impact of the proposal on these settlements.**

***Recreation***

**Objection**

As 5.3.4 above

***Transport***

**Objection**

As 5.3.5 above

***5.8. Viewpoint Assessment***

**Objection**

This section is severely misleading due to the limited amount of viewpoints chosen, as explained in the objection to 5.2.7 and 5.7.1 above. The inclusion of residential receptors closer to the development, in accordance with published policies and guidelines, would have given a materially different outcome to this impact assessment and would undoubtedly have led to **major visual impact** being identified for most of the residential properties to the north of the development from Blacktop in the east, through Silverburn to Easter and Wester Ord.

**It is my contention that the choice of viewpoints has severely limited the VIA to the extent that the complete LVIA is invalidated.**

**Grounds for Objection (3) - Failure to Fully Address the Impact on Cultural Heritage**

***6. ARCHAEOLOGY AND CULTURAL HERITAGE***

In table 6.1 of this section the applicant provides a list of ancient monuments and listed buildings with their distances from the proposed turbine. This list includes 7 Category B listed buildings, namely marchstones numbers 21 to 27 inclusive, 3 of which are within 650metres and 4 of which are within 1250 metres. In his concluding paragraph to this section the applicant states:-

*Consideration of visual impact upon cultural heritage has already been given in the landscape assessment in section 5. The sites listed above are sufficient distance away from the development that no impacts are likely.*

**Objection**

In recent years Aberdeen City Council has been emphasising the cultural heritage of the city and has been encouraging residents and others to visit the marchstones which

define the boundary of the Freedom Lands of Aberdeen, gifted to the city by Robert the Bruce in the 14<sup>th</sup> century.

Marchstone number 25 is on my property and my wife and I have firsthand knowledge that the number of visitors to this stone and to the others in the area has increased significantly over the last few years.

Visiting the stones involves walking between the stones across Beans Hill and across the fields and roads to the north of the development. This is sometimes carried out by individuals and more often by groups of people.

It is my contention that the proximity of the turbine and the associated change to the landscape will as a minimum reduce people's enjoyment of the experience and could deter people from visiting the stones. This will have a detrimental effect on the council's efforts to promote the cultural heritage of the city.

#### Summary of Objections

- The application is in breach of national and local policies and guidelines relating to the Green Belt and proximity to individual residences and towns and villages.
- The choice and number of viewpoints has been chosen selectively to minimise the visual impact, and is not in accordance with recognised guidance.
- Throughout his application the applicant has minimised the impact of the proposed development on residences, landscape and activities close to the location of the proposed turbine. There are approximately 50 houses close enough to the proposal to be materially affected and there are recreational routes close to the proposal, used by walkers, cyclists and horse riders, which have been ignored.
- No account has been taken of the three existing turbines on the top of Beanshill.
- No account has been taken of the proximity of the AWPR.
- The applicant has used spurious arguments regarding benefits to the community, and in relation to overall economic benefit resulting from renewable energy, has failed to demonstrate that there are no suitable alternative sites.

#### Additional Information

To provide some indication of the views from the north I provide overleaf two photomontages of the turbine in the landscape: -

- From East Brotherfield, our home.
- From the location of the AWPR.

On the basis of the above we urge the planning authorities to refuse the application.

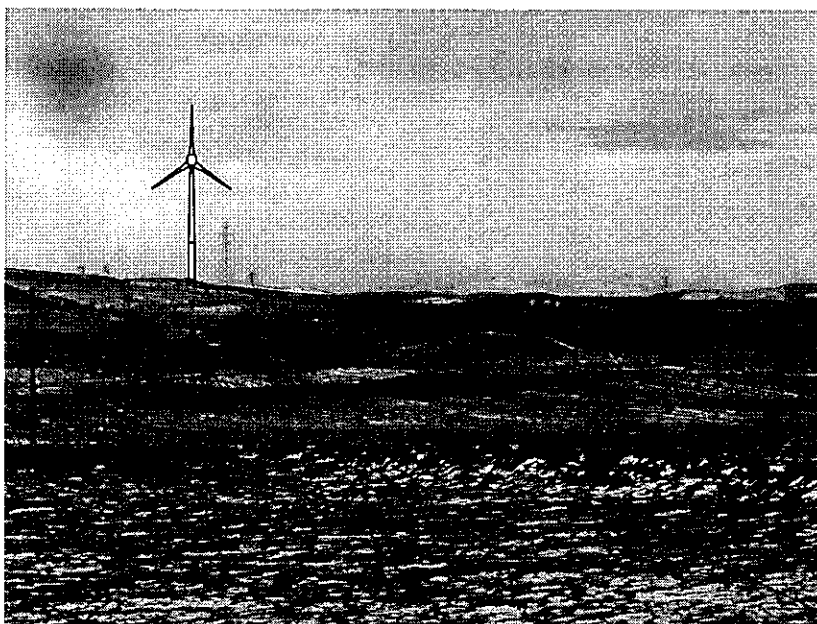
Yours faithfully,

John McIntosh

Carol A McIntosh



From East Brotherfield Farmhouse



From Location of AWPR

City Development Services Letters of Representation	
Application Number:	120166
RECEIVED	10 APR 2012
Dev. (Name)	
Cases Officer Initials:	REF
Date Acknowledged	11/04/12

**From:** <webmaster@aberdeencity.gov.uk>  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 09/04/2012 22:34  
**Subject:** Planning Comment for 120166

Comment for Planning Application 120166

Name : Heather Palmer  
Address : 2 North Lasts Steadings  
Peterculter  
AB140PE

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : I wish to object to planning application Ref 120166 - South Lasts Farm - 800 kW Wind Turbine on the following grounds:

1. Size, scale and relationship to character of the surrounding landscape - the size of this wind turbine is totally out of scale and character to the surrounding area and would dominate and impair the visual landscape around the majority of the Deeside area. Scottish national heritage siting advice for wind turbines shows that large scale turbines will be visually dominant in lowland smaller scale landscapes where there are scale indicators such as fields, buildings, pylons and trees. Photo montages can be deceptive, and I would request the planning officers to take a site visit. Indeed I could probably have picked ten view points where the turbine could be virtually unseen at the ranges chosen. From my own uninterrupted point of view at about 1000m North West of the proposed site I will be able to see virtually all 86.5m of the structure day and night (it will have to be lit for hazard to aviation reasons). This industrial turbine will be an eyesore, completely at odds to the present landscape and more worryingly may be the thin end of the wedge as it could be followed by many more conspicuous blots on the landscape if this one is approved. Why does it have to be 86.5m high, surely 4 turbines at 20.5m (same as those already in situ on Bean Hill) would be less offensive to the local community but still generate the same power.

2. Greenbelt policy SSP 21 - Based on the size and scale of this industrial development, I consider it to be inappropriate for the greenbelt and against the greenbelt policy which states that development of this type is only allowed if there is no alternative - this is clearly not true for this development, which can be reduced in scale and/or relocated to a more suitable location within Scotland.

3. Tourism and recreation - the area proposed for the above development is widely used for recreation and is part of a local 'round trip' walking / jogging / cycling route connecting the Milltimber and Peterculter communities. Many people enjoy the peace and tranquillity of the area and the stunning uninterrupted open views, which bring so many tourists to the Aberdeen and Deeside area. I believe that the addition of this industrial sized structure will severely impair the attraction of the surrounding area for recreation and tourism, and will not be supported by the local community using the area.

4. Driver distraction - This is a serious concern not adequately addressed in the planning application. I am a regular user of the B979 which is a rural road but a commuter route. This is a busy but poorly designed road with no pavements or cycle paths and with a low sun, can be particularly tricky to negotiate. It is a well known problem locally and unfortunately there have been many accidents, some fatal. It is unacceptable if even one additional accident occurred because of the sizeable structure / moving blades / rotating head distracting drivers.

5. Protection of open spaces, good management of landscapes, and sustaining biodiversity. A structure of this size is not in keeping with the surrounding landscape and is therefore not aligned with numerous government planning policies / advice notes and European directives. I do not believe that the environmental, social or economic benefits outweigh the detrimental effect this structure will have to the Deeside landscape. This is not a 'community development' and locally, only the developer stands to benefit from this structure which will be visible from most of the Deeside area. It is a tall order to believe that this is an attempt at diversifying South Lasts Farm! The claim about increasing local employment does not wash as these turbines, once constructed are virtually on remote control.

6. Noise and Impact on surrounding settlements - A 2km radius is generally recommended when assessing locations of wind farms (PAN 45) however this application does not indicate the number of settlements in that area. In the application supporting info settlement assessment, the community at North Lasts (5 houses) at approximately 1000m is totally ignored. The noise report is based on wind speed measurements at only 10m height (while assessing an 86m structure) and has a disclaimer which makes me wary of the results. Alternative locations outside the city boundaries are available for these large structures where they will not affect any settlements, or the turbine size should be reduced to an appropriate size for a populated area.

7. Impact on local oil and gas pipelines which run close to turbine location - particularly with respect to vibration. I did not see this covered in the report.

8. Although the development is apparently in the shadow of hills closer to the two radars servicing Dyce Airport air traffic will be impacted. The sheer size of the proposed turbine will certainly affect the Air Ambulance, Helimed helicopters on their mercy missions from the Aberdeen Royal Infirmary to HJS heliport at Culter for refuelling so that they remain on call and available for the whole of Scotland in all weathers as well as being a major consideration for all the test and training flights conducted by the Oil and Gas support helicopter companies.

9. Impact on television reception and community engagement - over 1300 homes will have television reception affected &#8211;the report does not adequately address this.

Given the nature of this application, the range of visual impairment and the number of people affected I am disappointed that the local communities of Culter, Milltimber, Cults, Bielside, Westhill, Maryculter have not been informed and engaged by either the planning department or the developer. This goes against the Government's own policies and advice which emphasises the importance obtaining local community views. Consequently, this application may not receive representative feed-back from affected communities adding weight to the &#8216;social gap&#8217; argument&#8211; the divide between public support for wind energy versus opposition to local wind farms. It is disappointing that tourists were canvassed regarding their thoughts on the proposed structure but not the local communities who will be affected most. In many European countries e.g. Denmark and Germany local authorities are often the motivating force behind wind farm developments and have direct involvement in the planning process and a share in the economic benefits. The fact that this proposal appears to be covertly sneaking in through the back door demonstrates either, that the council (and developer) are afraid to address the local communities&#8217; feelings or worse are disparaging of their so-called &#8216;nimby&#8217; views. This approach is totally unfair, unjust and self defeating, showing a lack of appreciation to the voters&#8217; concerns. I worry for the Dows&#8217; reputation and fear they may be demonised because they could be construed as putting their own proverbial &#8216;snout in the renewable trough&#8217; at the expense of their own community.

Please note that I am not anti-wind turbines. There are three smaller ones nearby to the proposed site whose impact on the landscape is minimal. It is the sheer size of this proposed turbine in relation to its surroundings, and the impact on the local communities & road users which concerns me most.

City Development Services Lobby of City Hall	
Application No.	120166
RECEIVED	10 APR 2012
Dev. (No.)	
Cases Officer Initials	REF
Date Acknowledged	10/04/12

*Planning & Sustainable Development  
Aberdeen City Council*

*Broomwood House,  
Blacktop,  
Countesswells,  
ABERDEEN, Scotland.AB15 8QL*



*Monday, 02 April 2012*

*APPLICATION REFERENCE: 120166 – 800kW Wind Turbine*

*Location – South Lasts Farm, ContlawRd,  
Milltimber.AB13 0ES*

*Dear Sirs,*

*I refer to the planning application for the above and have the following points to raise as to why this application should be refused.*

- 1) Air safety- Height - this windmill will be a danger to low aircraft mainly helicopters from the- HJS Helicopters, CulterHelipad, Baads, Anguston whether on training or some other reason.*
- 2) Large birds of prey – Buzzards, Red kites – both raptors use the skies to glide and hunt prey and are very numerous in this area.*
- 3) From a landscape perspective there is no point in selling Scotlands beauty if it is to be blighted by Stark White beast of a windmill. We love the view we get to Lochmagar and area and was one the main reasons we bought the house.*
- 4) Colour – stark white, surely a better effort to disguise it camouflage colours would help to mitigate no.3*

*An afterthought we need wind energy but in the right place and not one that suits interests!!*

*Yours faithfully,*

*W. Bennet,*

*Broomwood House*

*Blacktop, Countesswells,*

*Aberdeen.AB15 8QL*

*Tel: [REDACTED] Fax: [REDACTED] Mob. [REDACTED] Email. [REDACTED]*

*WITHOUT PREDJUDICE*



**From:** helen joss [REDACTED]  
**To:** "pi@aberdeencity.gov.uk" <pi@aberdeencity.gov.uk>  
**CC:** [REDACTED]  
**Date:** 07/04/2012 07:03  
**Subject:** Application Ref 120166 - South Lasts Farm - 800 kW Wind Turbine

Dear Sir or Madam,

I wish to object to planning application Ref 120166 - South Lasts Farm - 800 kW Wind Turbine on the following grounds:

1. Size, scale and relationship to character of the surrounding landscape - the size of this wind turbine is totally out of scale and character to the surrounding area and would dominate and impair the landscape around the majority of the Deeside area. Scottish national heritage siting advice for wind turbines shows that large scale turbines will be visually dominant in lowland smaller scale landscapes where there are scale indicators such as fields, buildings, pylons and trees. Photo montages can be deceptive, and I would request the planning officers to take a site visit.
2. Greenbelt policy SSP 21 - Based on the size and scale of this industrial development, I consider it to be inappropriate for the greenbelt and against the greenbelt policy which states that development of this type is only allowed if there is no alternative - this is clearly not true for this development, which can be reduced in scale and/or relocated to a more suitable location within Scotland.
3. Tourism and recreation - the area proposed for the above development is widely used for recreation and is part of a local 'round trip' walking / jogging / cycling route connecting the Milltimber and Culter communities. Many people enjoy the peace and tranquility of the area, and the stunning uninterrupted open views which bring so many tourists to the Aberdeen and Deeside area. I believe that the addition of this industrial sized structure will severely impair the attraction of the surrounding area for recreation and tourism, and will not be supported by the local community using the area.
4. Driver distraction - This is a serious concern not adequately addressed in the planning application. I am a regular user of the B979 which is a rural road but at also a commuter route and connects to two quarries. The Malcolm Road area between Culter and Westhill is where the turbine will be closest and most dominant visually. This road is used by joggers, horses, cyclists, drivers and industrial lorries. Many of the lorries using the road are not local so are unlikely to become 'used' to the view. This is a busy road, but is also poorly designed with no pavements or cycle paths, and with a low sun, can be particularly tricky to negotiate. It is a well known problem locally and unfortunately there have been many accidents, some fatal. It is unacceptable if even one additional accident occurred because of the sizeable structure / moving blades / rotating head distracting drivers.
5. Protection of open spaces, good management of landscapes, and sustaining biodiversity. Personally I feel that a structure of this size is not in keeping with the surrounding landscape and is therefore not aligned with numerous government planning policies / advice notes and european directives. I do not believe that the environmental, social or economic benefits, outweigh the detrimental effect this structure will have to the Deeside landscape. This is not a 'community development' and locally, only the developer stands to benefit from this structure which will be visible from most of the Deeside area.
6. Noise and Impact on surrounding settlements - A 2km radius is generally recommended when assessing locations of wind farms (PAN 45) however this application does not indicate the number of settlements in that area. In the application supporting info settlement assessment, the community at North Lasts (5 houses) is ignored. The noise report is based on wind speed measurements at only 10m height (while assessing an 86m structure) and has a disclaimer which makes me wary of the results. There are well publicised accounts of residents living next to wind farms indicating noise and vibration levels higher than those 'estimated' by developers. This constant noise causes a detrimental impact on residents general wellbeing & health caused by close proximity to these industrial structures - a double whammy if you originally chose to reside in a green belt tranquil location! Actual evidence of noise levels

and vibration, including measured data

and accounts from residents who are experiencing day to day effects of wind turbines should be taken into account along with representative calculations. Alternative locations are available for these large structures which will not affect any settlements, or structure size should be reduced to an appropriate size for a populated area.

7. Impact on local oil and gas pipelines which run close to turbine location - particularly with respect to vibration. I did not see this covered in the report.

8. Impact on television reception and community engagement - over 1300 homes will have television reception affected - report does not adequately address this. Given the nature of this application, and the number of people affected I am disappointed that the local communities of Culter, Milltimber, Cults, Bielside, Westhill, Maryculter - plus all those who may have reduced TV reception - have not been informed and engaged by either the planning department or the developer. To me, this goes against the governments policies and advice which emphasises the importance obtaining local community views. Consequently, this application may not receive representative feed-back from affected communities. It is disappointing that tourists were canvassed regarding their thoughts on the proposed structure but not the local communities who will be affected most.

Please note that I am not anti-wind turbines. There are three smaller ones nearby to the proposed site whose impact on the landscape is minimal. It is the sheer size of this proposed turbine in relation to its surroundings, and the impact on the local communities & road users which concerns me most.

best regards,  
Helen Joss.

**From:** Jack Lavety [REDACTED]  
**To:** <pi@aberdeencity.gov.uk>  
**Date:** 11/04/2012 23:26  
**Subject:** Planning Application No 120166 - Wind Turbine  
**Attachments:** Wind\_Objection.pdf; Wind\_Objection.odt

Please acknowledge Receipt - Thank you.  
Formal  
Objection to Grant of Planning Permission for Wind-Turbine on Beans Hill

Date 11th April, 2012

Application  
Reference:

120166

Local Authority  
Reference:

000034591-001

Proposal Description:

Proposed erection  
of a single 800 kW wind turbine and associated ancillary equipment and access  
track.

I object to this proposal on the grounds that:

- 1) This  
86metre high Turbine is totally unsuitable on this scenic country site.
- 2) It is  
within ½ mile of long established dwellings.
- 3) That the  
planning process is invalid as it has been processed in exactly the same way as  
if the applicant had applied to have a shed erected in his garden –  
specifically, because the neighbours are more than 20metres from the proposed  
site, they were not required to be notified and you did not notify them.  
Considering the height of the Turbine, the 20 metre distance rule is an

absolute nonsense! 2000 metres would have been reasonable.

4) This is a large industrial machine, it can generate sufficient power to run about 70 full size electric fires – far more than any large house or non-industrial farm can use. The Planning Application should have been treated under the same category as a Waste Incinerator or other Large Industrial Plant

5) The Turbine is useless on it's own – the power is variable it and it will have to be linked to the National Grid – as such, with current grant aid, it is simply a money-making device and not serving any local need.

6) The application is likely to be the thin edge of the wedge – other residents will doubtless apply.

7) The date given for Objections to be lodged has been wrongly stated causing confusion and delay.

Should this application be granted, I will be considering legal action under the heading 'Misuse of Planning Procedure – Wrong Categorisation'

Yours sincerely,

Jack Lavety BA, FIAP, FIFST

16 Deeside Park

ABERDEEN

AB15 7PQ

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