

MOORSYDE ACTION GROUP

Observations on supplementary ZVI information

Moorsyde wind farm. Planning application no. 04/B/1107

This is a response by Moorsyde Action Group (MAG) to supplementary environmental information submitted by Your Energy Ltd in a letter and accompanying documentation dated 23 January 2008.

This response deals specifically with the following submitted documents:

Zone of Visual Influence (ZVI) mapping as prepared for Your Energy Ltd by Jacobs Babbie, comprising:

- Figure 10.3, 'Zone of Visual Influence, Photomontage Viewpoint Locations' [original 14 turbine scheme];
- Figure 10.4, 'Zone of visual Influence within 5km, Photomontage Viewpoint Locations' [original 14 turbine scheme];
- 'Zone of Visual Influence, 7 Turbine Layout' (Figure 10.3 Revised for 7 turbine layout, no figure number given), and
- 'Zone of Visual Influence within 5km, 7 Turbine Layout' (Figure 10.4 Revised for 7 turbine layout, no figure number given).

Preliminary observations

MAG repeats our previous observations on the poor quality of the ZVI information provided by the applicant. The failure to follow guidelines and the poor quality of the work undertaken is endemic in the applicant's landscape and visual impact assessment, both in the original Environmental Statement (ES) and its subsequent revisions.

Incomplete revised ZVI information

The applicant has only supplied revisions of two of the original four ZVI diagrams.

The applicant has not supplied revisions of Figure 10.5 'Wind Farm Locations' and Figure 10.6 'Cumulative Zone of Visual Influence of Surrounding Wind Farms Within 30km'. According to Ironside Farrar's independent Audit Report on the Moorsyde ES both of these failed to contain sufficient or accurate information when they were submitted as part of the original ES. These figures are now out of date and seriously misleading.

The fact that the applicant has omitted to revise these figures only serves to underline the problem caused by their refusal to submit a new application. The applicant has twice revised the application, to the point where it bears little relation to the original. Much of the original EIA work that the current applicant has submitted was undertaken by the original developer, ATCO, for the 17, then 14, turbine scheme that they abandoned in the summer of 2004. This ES work was incomplete and inadequate at the time the planning application was submitted and is now seriously out of date and does little to inform decisions on the present 7 turbine scheme.

The inadequacy of the ES information the applicant has submitted and the need for a new

application is underlined by their failure to submit revised versions of the two ZVI diagrams.

Had the applicant submitted a revision of Figure 10.6, it would have raised the question of why their revised application omits any mention of the adjacent proposals at Barmoor and Toft Hill, or of the applications at Middlemoor and Wandylaw. All of these should be considered in any examination of zones of visual influence, especially with regard to cumulation.

Inadequacy of the original and revised ZVI information

The applicant originally provided 4 simple ZVI diagrams for the 14 turbine scheme. The independent audit of the original ES, commissioned from Ironside Farrar by Berwick Borough Council, pointed out that even in the very basic work presented in the ES, the applicant's conclusions were contradicted by their own mapping.

The Audit Report also criticised the limited scope of the cumulation information provided by the applicant, which omitted proposals and underrepresented the potential impacts by limiting the ZVI radius to 30km. The landscape and visual impact assessment as a whole was the subject of extensive and serious criticism by the independent consultants.

Ironside Farrar stated:

3.3.2 Predicted Impacts: Conclusions and Recommendations

Cumulative impacts.

The cumulative impact assessment does not follow the quoted guidance. Instead of the ZVI showing the cumulative impacts of 8 additional wind farms within 60km, only the 2 within 30km are shown, under-representing the potential impacts. For example Crystal Rig wind farm (35km distant) was not included and yet was visible from near the site on a visit.

MAG repeats our original criticism of the choice of a 30km radius for ZVI mapping:

We consider the ZVI limit of 30 km to be arbitrary and not to reflect the applicant's referenced guidelines. The SNH's 'Recommendations for ZVI radius in relation to height of turbines' is for a ZVI radius of 35km for turbines over 100 metres in height including rotors. This document further states, *"The distance will need to be increased to take account of any cumulative effects with other wind farms."* The applicant's chosen limit of 30 km results in the exclusion of the Crystal Rig wind farm from consideration in cumulative impacts, despite this wind farm being visible from a wide area in and around the Moorsyde site, ...

(6.14, Moorsyde Action Group. Environmental Statement: Initial Response. 5 March 2005).

It should be noted that the ZVI mapping produced by Entec for the neighbouring Toft Hill application follows the guidelines in registering all wind farms within 60km and uses a 35km radius for detailed cumulation mapping.

MAG would also ask why the applicant has chosen not to include the viewpoints used for photomontages on their revised mapping. The original ZVI diagrams bore the legend: 'Zone of Visual Influence, **Photomontage Viewpoint Locations**'. The lack of any viewpoint information further detracts from the usefulness of the two revised diagrams.

Lack of information

As MAG has previously brought to the Council's attention in our report of December 2007, 'Observations on the Ferguson McIlveen 'Moorsyde wind farm planning and visual impact

appraisal; March 2007' and Scott Wilson 'Moorsyde wind farm addendum; August 2007', the Ferguson McIlveen and Scott Wilson reports on Moorsyde in no way remedy the lack of information on cumulation that should have been provided by the applicant.

In our report we pointed out that, '... the Companion Guide to PPS22 lists seven key points which could be used in assessing cumulative landscape or visual effects of wind farm applications:

1. Production of a base plan showing all wind farms which have been constructed, consented or applied for within a specified radius of the proposal under consideration.
2. Production of a plan showing cumulative zones of visual influence (ZVIs) for each wind farm, clearly identifying those areas from which one or more wind farms can be seen.
3. The plans should account for local topography and prevailing meteorological conditions.
4. The cumulative ZVI map should be used to identify appropriate locations for visual impact studies, including simultaneous visibility assessments where two or more schemes can be seen from a fixed view-point without the observer turning their head and repetitive visibility assessments where the observer is able to see two or more schemes if they turn their head.
5. Identification of sequential effects as the observer moves through the landscape.
6. Photomontages of existing and consented turbines should be shown from points identified using the maps of cumulative ZVIs.
7. Assessment of cumulative effects on landscape character or designation, sense of distance, existing focal points in the landscape, skylining and the sense of remoteness or wildness.

The Fermac and Scott Wilson reports fail to address or undertake any of these, and nor does either report provide any alternative methodology for assessing landscape capacity, visual impact or cumulative impact.'

Conclusions

The supplementary ZVI figures provided by the applicant add little to the information available for determining this application.

In fact, the applicant is now presenting *less* reliable ZVI information than was provided in the original ES, in January 2005, as they have only provided 2 revised diagrams instead of four. They have failed to address the criticisms and recommendations made by Ironside Farrar's Audit Report regarding the original ZVI information.

The question of cumulation has not been addressed by Scott Wilson's 'Moorsyde wind farm addendum; August 2007' and continues not to be addressed adequately by the applicant.

Moorsyde Action Group Steering Committee

25 February, 2008.