

Our Ref: RA/LJH RE/S/812/PL2

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Dear Jane

## **KYPE MUIR EXTENSION SECTION 36C: BANKS RENEWABLES RESPONSE TO EAST AYRSHIRE COUNCIL COMMENTS**

Further to receipt of the consultation response from East Ayrshire Council (EAC) dated 26 August 2018 we have reviewed your comments in detail and would like to respond to the points raised as follows. A copy of this response has also been issued to South Lanarkshire Council and the Energy Consents Unit.

### **ZTV study showing numbers of turbines visible**

EAC requested a ZTV showing numbers of turbines visible – expressing concern that there may be a notable increase in the number seen from parts of East Ayrshire. A ZTV indicating the total number of turbines visible to hub height was provided with the application as Figure 2 in Technical Appendix 4.4 (albeit for a 15km rather than 25km radius). Figures 4.7 and 4.8 of Volume 2 also show comparison visibility between the consented and proposed scheme.

However, in order to address this request Supplementary Figure 4.9 (attached) has been prepared to show how many more turbines would be seen. Figure 4.9 indicates that across most of East Ayrshire, the turbines would either not be visible, or there would be no increase in the number of turbines seen. Along the settled A71 corridor, the increase would typically be 1-3 more turbines, with more open higher ground typically having visibility of 4-6 more turbines, with small areas seeing 7-9 more turbines.

These increased numbers of turbines would be seen in the context of other existing and consented intervening wind farms in most instances, such that the increased numbers would not materially increase impacts.

### **Additional viewpoints**

EAC requested a number of additional viewpoints as follows:

- **Cairn table (SW of Muirkirk)** – This was viewpoint 18 for the previous application and was omitted during the scoping process for this application as effects were previously assessed to be Negligible and it was judged unlikely that significant effects would arise in this location 11.8km from the site. All of the viewpoints beyond 8km were assessed to

receive either Small-Negligible or Negligible scale effects (see Table 4.4 of the EIAR), and effects on this viewpoints would be expected to be Negligible.

- **Galston, Newmilns and Darvel** - (along A71 west of site) – The viewpoints requested in these settlements are approximately 12 and 18km west of the site. The wind farm would be seen beyond the nearer turbines of Bankend Rig and Dungavel. Like viewpoint 16 at Loudon Hill – (which is west of the site along the A71, but closer and more elevated), and other viewpoints beyond 8km, effects would be expected to be Negligible. The provision of two additional viewpoints to demonstrate these non-significant effects is a disproportionate request given the cost of accurate visualisations.
- **A70 between Lugar and the junction with the B743** (10-18km SW of site) – This is a stretch of road with some visibility of the turbines at distances of 10-18km. Northbound drivers will be heading towards the site and will see the turbines directly in front when views are not interrupted by the occasional buildings and trees along the route. Figure 2 in Technical Appendix 4.4 of the ES indicates that visibility would vary between 1-3 turbines at hub-height and 4-6 turbines at hub height in the section of route within 15km of the site. Given the distance, effects are likely to be at most Small scale, and more typically Negligible, and will not be significant.

Given that all of the requested viewpoint locations are likely to experience negligible effects, it is felt disproportionate to provide additional viewpoints given the notable cost involved in preparing accurate visualisations to SNH standards. A comparative wireframe (Supplementary Figure TA 4.2 Figure 2) has been provided to show the change in layout as seen from Cairn Table, which is amongst the closest of the locations requested and likely to experience the greatest effects of those requested given that it is the most open view, closest to the largest proposed turbines and least affected by intervening wind farms.

### **Night time assessment**

EAC requested an assessment of night time visibility from a location west of the site, suggesting either Foulpapple Road north of Darvel or the A71 between Darvel and Newmilns as an appropriate location. Figure 2 in Technical Appendix 4.4 of the ES indicates that all of most of the lights would be visible from these locations, though of the two, Foulpapple Road has the more open outlook. Both of these locations would have the village of Darvel and associated street lighting visible in the view towards the site, and drivers heading along the A71 would also see red car tail lights ahead of them. Of the two, Foulpapple Road has the least existing lights in the view, although as the road rises, the Darvel mast to the south becomes increasingly visible. Given distance the distance to the turbines (14km), effects would be expected to be Negligible. The composition and visibility of the lights as seen from Foulpapple Road is illustrated by the diagram provided as Supplementary Figure TA4.4 Figure 9.

### **Updated wind capacity study**

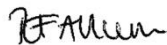
EAC note that they have published a new capacity study in June 2018 but do not request that it be considered. Given that this study is intended to direct wind development within the district, it is not judged necessary to update the LVIA to take this document into account. In summary, the character area 18a East Ayrshire Plateau Moorlands is assessed within the new study to have a High-Medium sensitivity to development within it (which the site is not), with most of the criteria which contribute to the higher levels of sensitivity relating to development on or near the outer slopes of the plateau, or on or near the distinctive landmark hills (which are not near the site). Given that effects on the character area are judged to consist of localised Small scale effects that

are Negligible overall, the increase from Medium to High-Medium sensitivity would not alter the assessment outcomes.

### **Summary and Conclusion**

The lack of information provided regarding effects on East Ayrshire reflects the very limited (largely negligible) effects. Some additional information has been provided to evidence these limited effects and it is suggested that providing further information would be disproportionate.

Yours sincerely



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Enc: CD containing ZTV Supplementary Figure 4.9, Comparative Wireframe Supplementary Figure TA 4.2 Figure 2 and Supplementary Figure TA4.4 Figure 9