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Our Ref: - INF 1/4

Date: 26 August 2018

Energy Consents Unit
The Scottish Government
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Dear Lesley

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017

KYPE MUIR WIND FARM EXTENSION VARIATION – ECU REFERENCE ECU00000541

Thank you for consulting with East Ayrshire Council on the above application.

Background

I note that the application is for consent to vary the existing Section 36 consent to construct and operate the Kype Muir Wind Farm Extension, previously consented by Scottish Ministers in September 2016. The variation seeks to make several amendments including an increase in the maximum tip height and rotor diameter of the turbines.

The application site is fully within South Lanarkshire but is contiguous with the East Ayrshire boundary at the sites most southern point. The current consent allows for 15 turbines; 8 with a tip height of 152 metres and 7 with a tip height of 132 metres. It is proposed to increase the height of the turbines; 4 to 156 metres, 3 to 176 metres, 4 to 200 metres and 4 to 220 metres.

East Ayrshire Council was not consulted at the scoping stage, so has not had a chance to comment on the proposal prior to this stage. The comments below are therefore set in the context of this being the first chance the Council has had to comment on the proposal.

Landscape and Visual Impact Assessment

The Council has considered the significant increase in turbine height, with particular regard to landscape and visual impacts. The updated Landscape and Visual Impact Assessment includes a Zone of Theoretical Visibility Study, which demonstrates spatially the difference in the visibility between the consented scheme and the proposed scheme with the new turbine

heights. The ZTV indicates that the extent of the areas in which visibility of the scheme will be introduced is fairly limited.

However, there is no ZTV which demonstrates the change in the number of turbines that will become visible as a result in the increase in the height. East Ayrshire Council would have expected such information to be provided for an application of this type, particularly given the significant increase in turbine height proposed. For example, significant swathes of East Ayrshire, particularly along the A71 Irvine Valley and to the north East and south west of Cumnock are shown to have visibility of the consented scheme and will therefore continue to have visibility of the proposed scheme. However, the Council has no indication of the number of turbines this includes. Given the large increase in height it is entirely feasible that the number of turbines in views will significantly increase. The visualisations associated with the original extension application are not available online, which makes it difficult to compare the schemes. However, the Council would contend that it is likely that across parts of East Ayrshire perhaps only 1 or 2 turbines would be visible in relation to the consented scheme, but this could increase to 10 – 15 turbines when the height is increased. The absence of this information, makes it difficult for the Council to fully understand the impact of the proposal across parts of East Ayrshire. It is therefore requested that an additional ZTV be produced, demonstrating clearly the difference between the consented and proposed developments in terms of **the number of turbines visible to tip height**.

In relation to viewpoints, it is noted that there is only one in East Ayrshire; viewpoint 16 Loudoun Hill. Generally, the viewpoints are located very much to the north of the site around Strathaven, Stonehouse and the South Lanarkshire stretch of the A71.

East Ayrshire Council is of the view that the landscape and visual assessment of the proposal does not adequately address potential impacts on East Ayrshire. Whilst it is accepted that the impacts are likely to be more significant to the north and within the 10km buffer, the proposal is nonetheless for very tall turbines; significantly higher than what is already consented at Kype Muir or indeed consented or proposed anywhere in East Ayrshire. It is therefore expected that the landscape and visual impact of this proposal, including impact on long range views, is robustly demonstrated. In line with this, East Ayrshire Council would request that consideration be given to providing viewpoints and analysis from the locations listed below. The exact positioning of viewpoints should be informed by the ZTV requested above, taking account of the number of turbines that will be visible.

- Cairn table to the south west of Muirkirk. This was included within the LVIA for the previous Kype Muir extension application and it is unclear why it has been omitted this time. The ZTV indicates visibility and it is a standard high point routinely used in LVIA's, popular for walking and recreation, which would provide a long range view from the south.
- The Irvine Valley communities (Galston, Newmilns and Darvel) / A71. The current LVIA does not include any view points from this area. East Ayrshire Council would have expected this area to be included in the LVIA and would request that appropriate viewpoint are added at this point. Whilst the exact location of the viewpoints will be up to the applicant, the Council would suggest these could comprise the A71 around

the Galston roundabout and a point within Darvel representing the impact on views from residential properties.

- The ZTV provided, shows that the development will be visible from much of the stretch of A70 between Lugar and the junction with the B743. A viewpoint around Stonebriggs or Welltrees, demonstrating the impact on long range views, is therefore requested.

With particular regard to night time visibility, it is noted that, similar to the daytime assessment, the proposed approach to assessment involves limited consideration of impacts to the west and south. Again, whilst it is accepted that the ZTV produced indicates that the impact is likely to be most keenly experienced to the north, East Ayrshire Council is concerned that the impacts on East Ayrshire will not be fully demonstrated. It is therefore requested that an assessment be carried out at an appropriate location further to the west. Whilst the applicant will be best placed to select such a location, it is suggested that an appropriate point may be the A71 between Darvel and Newmilns or on Foulpapple Road to the North of Darvel.

Updated policy context

The applicant should be aware that as of June 2018, East Ayrshire Council approved an updated Landscape Wind Capacity Study. This is available on the Councils website and replaces the previous 2013 study.

Summary

Without the information outlined above, East Ayrshire Council is not in a position to take a view on the acceptability or otherwise of the proposal on East Ayrshire. The Council would therefore ask that the applicant be asked to respond to and address the points raised above, after which the Council will take a position on the application and respond accordingly.

Should you require any further information on the points raised above or wish to discuss any matter, then please contact Alison O’Kane on the above number or on alison.o’kane@east-ayrshire.gov.uk.

Yours sincerely

Redacted

Karl Doroszeńko

DEVELOPMENT PLANNING AND REGENERATION MANAGER