

SUPPORTING STATEMENT

REVIEW OF APPLICATION 11/00032/APP

INSTALLATION OF A SINGLE C & F GREEN  
ENERGY 20kw WIND TURBINE ON A 20m MAST  
IN ORDER TO GENERATE ELECTRICITY

LAND ADJACENT TO LORRY PARK  
KEITH  
MORAY

In support of the online submission of an application for the review of application 11/00032/APP for the installation of a single C & F 20kw wind turbine on a 20m mast, which was refused planning consent on 1<sup>st</sup> July 2011, we would like to take this opportunity to respond to the reasons of refusal with regard to this application.

The application for the wind turbine was refused due to the proposal being contrary to policies E10 Countryside Around Towns, E9 Settlement Boundaries, ER1 Renewable Energy Proposals, IMP1 Development Requirements and EP8 Pollution, of the adopted Local Plan (2008).

It was determined that the proposed wind turbine would represent an inappropriate development within the CA|T which would detract from the special character of the Countryside around Town designation and its presence would fail to preserve the distinction between the built up area and the countryside, undermining the aims of policy E10 and contrary to policies ER1 and IMP1 which seek to safeguard landscape character. The position of the turbine, adjacent to the I3 Bridge Street Industrial Estate designation to the north and west would give rise to potential noise disturbance and shadow flicker, contrary to policies IMP1, EP8 and planning advice note 1/2011.

The turbine situation is within the Countryside Around Towns designation, immediately outwith the settlement boundary of Keith and is not in a Preferred Search Area, however we feel that a development of such small scale should be not be viewed as development sprawl as it will not detract from the special character of the area or cause any loss of distinction between the built up area and the countryside. The turbine position, within proximity to the industrial estate and the boundary of I3 being 30 metres from the proposed site, allows for a natural integration, in visual terms, of the site and the industrial buildings. However this visual integration, due to the very small site area, is not a physical expansion of the existing boundaries or development extension. The turbine is very small in size and scale and in keeping with similar vertical structures already present within the landscape. This integration and conformity may then be viewed in context with the industrial estate and not as a stand alone, solitary installation within the countryside which may erode the distinction between the settlement boundary and the countryside. Because of this visual continuity the turbine can become integrated in the long term with the existing and any new development of the industrial estate without detracting from the current landscape character.

In relation to noise disturbance and shadow flicker, a generic noise assessment was submitted in support of the application which was undertaken in a rural location where the background noise levels are low. Whilst it is accepted that there will be no issue in regard to residential properties due to the separation distance from the turbine and the noise sensitive properties, it has been highlighted that there may be an issue with regard to potential noise disturbance and shadow flicker impacting upon future occupiers of the units if uses within the estate where to be office based. It is estimated that the background noise levels within the estate will be of a

much higher level than that of a quiet rural environment such as that undertaken in the submitted noise report and as such the level of audible emissions may be of a much lower level than that predicted (sound pressure level of LAeq 48dB (8m/s) plus an additional 3dB due to a façade effect). With the envisaged higher background noise level it is estimated that the turbine would not exceed the WHO Community Noise Guidelines Values of a sound pressure level of LAeq 50dB.

The primary guidelines for large scale wind turbines and potential flicker is a separation distance to properties in a direction susceptible to flicker of 10 times rotor diameter. However for small scale turbines, as per this application a more relaxed guideline, taking into account that there will be no residential properties affected and that shadow flicker can cause a problem to nearby properties early in the morning or late in evening and not on a permanent basis is generally accepted. Shadow flicker is caused by the rotating blades interrupting the light from sun when the turbine is between the property and the sun. This occurs early in the morning to the west of the turbine and late in the evening to the east of turbine. The effect is likely to be worse on sunny days in winter than in summer, as in summer the sun is much higher for longer and therefore the shadow is more local to the actual turbine. No property with a window facing the turbine should be within 36m of the turbine location from due east, through north, to due west. Care should be taken to ensure that any property within 72m at a direction from 120 degrees west to 120 degrees east of the turbine location does not have a light sensitive outlook towards the turbine. There are no residential properties within this area and at the time of application no office related buildings within this vicinity. It has been intimated that there may be a future loss of amenity on the development of the industrial estate due to flicker, however it is unlikely that buildings would be constructed up to the very edge of the industrial site, allowing for a greater separation distance, and it is likely that project managers of the site development would, it is presumed, take into account all potential obstacles when designing the layout for future developments.