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Subject: Coconsultation on Draft Structure Plan

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Ian Johnson
Ayrshire Joint Structure Plan and Transportation Committee.
15 Links Road
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25th August 2004

Dear Mr Johnson

Consultation Draft for the new Structure Plan for Ayrshire

Thank you for sending me the consultation draft.

The aspect of the draft on which I would like to comment is that relating to renewable energy.

I appreciate that this is not the place to debate the usefulness to the country or the planet of wind turbines, and I also appreciate that you have to take account of government policy in this regard. I would only say that I think that their relative inefficiency should be taken into account when set against the impact that they have on landscape, one of our most precious natural assets, and on the vital guiding principle of sustainable environmental and economic regeneration.

Wind turbine developments are not needed to meet Britain's Kyoto obligations – these have already been met.

Wind makes sense only in the short term, as the form of renewable energy which is 'closest to market'. In the medium term, its inefficiency will come to make 400ft turbines seem doubly dreadful. They are little more than a public relations exercise in green posturing – not 'farms' at all, but industrial intrusions, which require fossil – fuel back up. At great public expense, they damage without benefit.

Earlier this month, the Government announced a £50 million grant towards the development of – among other renewables – wave and tide power. Given Scotland's long coastline, developments such as these are likely to prove more reliable and less environmentally damaging than wind.

Equally, in the present depressed state of agriculture, farmland solutions such as biomass, bio-ethanol and bio-diesel would provide better employment prospects in rural areas and could actually enhance the landscape, particularly of opencast coal sites.

It would be a tragedy if the new found hope for the future and the great local efforts to regenerate the economy in a green and sustainable way were to be sacrificed for a form of energy generation which no expert seriously

expects to last. The sacrifice, and the mortal blow to a spirited community which has already given so much, would have been for nothing.

We believe that Policy E11 of the current Structure Plan is good. If areas are to be targeted for wind farms however, we hope that Dalmellington will be spared and allowed to demonstrate its will to regenerate.

I fully support your proposed guiding of turbine installations of two identified areas where there will be minimum impact on communities and landscape. I also support your aim of relating the number and capacity of turbines to the proportion of energy use in Ayrshire compared to the nation as a whole.

I write with particular reference to the communities and landscape of the Upper Doon Valley, which I believe may have been one identified as a possible preferred location. While I understand that the country around Dalmellington may no longer be a candidate due to the impact on the approaches and navigation equipment at Glasgow Prestwick International Airport, I believe that this area should be safeguarded against wind turbines for additional and vital reasons. I therefore believe that, within the guidance advocated in NPPG6, Dalmellington and the Upper Doon Valley should be indicated clearly as an area that would be sensitive to wind energy development and where proposals for wind energy (but not other forms of renewable energy, such as biomass) would only be considered in exceptional circumstances.

I know that Local Plans follow Structure Plans rather than the other way round, but in order to address the reasons why I believe this area should be safeguarded, it may be a good idea to do so in the context and framework of the recently adopted East Ayrshire Local Plan. Appendix 1 attached to this letter sets out the relevant sections of the Local Plan in red. After each section there follows in black an analysis of how wind turbine developments would relate to it.

Appendix 2 sets out other reasons why I believe that this area has enormous potential for environmental and economic regeneration and why this potential would be removed if turbines were developed here.

Great swathes of Ayrshire, particularly East Ayrshire, have been scarred by opencast. The country around Dalmellington, including the unspoilt hinterland of Loch Doon and the hills between Dalmellington and the conservation village of Straiton, is a beautiful oasis. There is tremendous potential here for further landscape and environmental enhancement and for sustainable regeneration.

We do not oppose turbines for the sake of it. We have definite plans for regeneration, many of them already underway, which are simply incompatible with them.

One positive suggestion, following an example by Lincolnshire Council in England, would be to have a general presumption against wind turbines but an enthusiastic approach to renewable energy from biomass and biofuels. This would have a doubly positive effect on Ayrshire; it would lead to landscape and biodiversity improvement on the huge areas of former opencast land and it would provide many jobs. It would be an investment in the future of Ayrshire as well as being an effective contribution to renewable energy. I would welcome the opportunity to discuss the issue if that would be helpful.

Yours sincerely

J Mark Gibson

Enc. Appendix 1.
Appendix 2.

APPENDIX 1.

East Ayrshire Local Plan and how turbine proposals sit with policies therein.

The East Ayrshire Council Commitment

The Council has adopted as its key values ‘Quality, Equality, Access and Partnership’. In serving the people of East Ayrshire this Council will seek:

- To eliminate poverty, deprivation and unemployment

Two current applicants, Scottish Coal and Amec have confirmed that their proposed wind farm would produce no local jobs once construction is complete. The same is likely to be the case for any other would-be developer.

Wind farm developments would cost the area many jobs, by blighting the landscape, and preventing regeneration based on tourism.

- To protect the weak and vulnerable in every community
- To secure a quality environment for living and working

Wind farms, particularly the new generation of 100 - 130m turbines would dominate the skyline above Dalmellington, Bellsbank, Waterside, Polnessan, Patna and the surrounding countryside. They would destroy the new found pride and love among the local community of the beautiful countryside of the Upper Doon Valley. They would counter all the environmental improvements and regeneration projects carried out over the last few years by local volunteers, farmers and organisations such as the Minerals Trust, The Dalmellington Partnership, East Ayrshire Council, SNH, SIP, the Forestry Commission and others. These include:

- Landscaping of the Bogton Mine bing followed by tree planting.
- Replanting of historic native woodland between Bellsbank and Dalmellington.
- Creation of a Community Garden in Dalmellington.
- Restoration of Grade A Listed buildings and Designed Landscape at Craigenkillan.
- Planting of trees and creation of footpath with wheelchair access along the Muck Water.
- Creation of carefully planned 250 acre native woodland on Auchenroy Hill to improve the landscape and the setting for Dalmellington and Bellsbank and to create additional wildlife habitat.
- Creation of a public footpath through the dramatic and magnificent Ness Glen. This project is the result of a partnership between the owner, the Forestry Commission, SNH, East Ayrshire Woodlands, the Scouts, Minerals Trust and SIP.

The river gorge, which is also a SSSI, was famous in Victorian times and attracted many visitors to the area. It is expected that it will do so again.

- Establishment of over 15 miles of new hedging on the hill pastures surrounding Dalmellington to enhance the landscape and the habitat for wildlife.
- Planting of a long avenue of Oak and Lime trees along the public road between Waterside and Dalmellington.
- Rebuilding over 3 miles of the stone dykes which are a feature of the local landscape.
- Positive management of the four SSSI's which will become an important part of the ecotourism planned for the area.
- Restoration of Listed Stables building to establish a horse livery and trekking business that has already created two permanent jobs, with a further two in near prospect.
- Positive management and enhancement of the rich archaeological heritage of the Upper Doon Valley which ranges from Bronze Age burial sites, Mediaeval field systems creating a fascinating landscape on the Scheduled Monument of Dalnean Hill, an ancient Motte and the Grade A Listed industrial buildings at Dunaskin.
- To strive for a society based on equality and equal opportunities

Land Use Development Aspects of the Council's four Corporate Strategies.

Economic Strategy aims to:

- Assist economic development through the provision of attractive sites and premises, through the improvement of physical infrastructure and through the promotion of development opportunities.
- Enhance the image of the area

Dalmellington and the Upper Doon Valley do not enjoy a great image from outside. It is perceived as a rough place with high unemployment, scarred by industrial dereliction and opencast coal workings.

In recent years the image has begun to improve as a result of the many environmental improvements. Events such as the Boxing International and the planned Outdoor Curling Centre, together with existing enterprises such as Dunaskin / the steam railway and the Book Town will increasingly make people from outside and within associate Dalmellington with something positive and exciting.

Wind farm development would reinforce the old and poor image of Dalmellington as an industrial 'dumping ground' and would prove a complete disincentive to further improvement.

- Promote tourism

Wind farms here would be visually intrusive and would detract greatly from the beauty which attracts visitors. They would reinforce the current negative image of the place. To succeed and be sustainable, projects such as those referred to above rely on attracting visitors. If wind farms are developed, projects such as the Curling Centre and Outdoor Activity / Environmental developments will not proceed – Dalmellington in particular and Ayrshire generally will suffer.

- **Regenerate local communities**

The first green shoots of sustainable regeneration in Dalmellington and the Upper Doon Valley are tender and fragile. They will not be able to withstand the negative impact of wind turbines. If left alone and encouraged however, the chances of real regeneration are strong.

Communities with a stronger image and with greater prosperity would be seriously affected by such developments but might survive. Dalmellington would not.

Environmental Strategy aims to:

- **Maximise the re-use of urban land and buildings and minimise the development of Greenfield sites**

Wind farm developments would be likely to occupy Greenfield sites. Present land use is forest, moorland and ground restored following opencast operations. Furthermore, the developments would have a major detrimental impact on neighbouring greenfield areas.

- **Safeguard and enhance the natural environment and built heritage**

Wind farm developments would do the reverse. With their vast scale, the landscape cannot absorb them. They would dominate the hills and the wild scenery of the Upper Doon Valley as well as the settings of Conservation Areas, Listed buildings and a Designed Landscape.

Social and Equal Opportunities Strategies aim to:

- **Address social problems of disadvantage, deprivation and social exclusion**

2.2 The Local Plan has a primary strategic aim, which is:

‘To promote sustainable development, to maximise the potential of East Ayrshire and to improve the quality of life of its residents.’

This primary aim is supported by a series of more specific, related aims which endeavour to balance the need for development against the need to conserve the unique character of the area. These aims are:

AIM 1 – To maintain and improve the integrity, vitality and viability of the area settlements and their rural settings.

AIM 2 – To facilitate the expansion and diversification of the East Ayrshire economy and to maximise the economic potential of the area for industrial, business, commercial and tourism development.

AIM 3 – To protect, conserve and enhance the character, appearance and amenity of East Ayrshire, especially as regards its landscape quality, the built and natural environment and areas of natural heritage and built heritage importance.

AIM 4 – To maximise benefits to the area by providing an improved and integrated transportation infrastructure and promoting the development of stronger communication links with the national strategic road and rail networks.

AIM 5 – To provide an adequate supply of effective housing land and associated facilities and services to meet anticipated demand.

AIM 6 – To strengthen and improve the viability and vitality of the strategic retail and office base of East Ayrshire.

The primary strategic aim and four of the six supporting specific ones (Aims 1,2,3 and 5) are at total odds with wind turbine developments.

- The integrity of the area (aim 1) would be severely damaged by such dominating developments, current generation turbines being as high as 50 storey office blocks and nearly four times larger than those at Windy Hill and Harelaw Hill.
- The vitality of the area (Aim 1) would be hurt as a result of the extinguishing of current hopes of regeneration. There would be fewer businesses, fewer or no projects to promote the image of the place and fewer job opportunities for school leavers.
- The viability of the area (Aim 1) would be greatly reduced, as the single greatest perceived area of development – tourism – would be hit on the head not only because the landscape would be less attractive but also because the projects being planned, which rely on visitor numbers, will not proceed.
- The economy of the Upper Doon Valley specifically, and East Ayrshire generally, would contract if the diversification projects, and the tourists that will come to them, do not materialise. They will not materialise if wind farms are permitted here. Such developments are therefore at odds with Aim 2.
- Wind turbine developments are completely contrary to Aim 3. In addition to the beauty of the surrounding hills as a whole, much of the land around Dalmellington is classified as a Sensitive Landscape Area and thus a Safeguarded Area. Even turbine developments outwith the Sensitive Landscape Area would severely impact onto it due to their large scale. Craigengillan, on the edge of Dalmellington, is one of only 4 Designed Landscapes in East Ayrshire. Its setting would be marred by turbine developments.

Much public and private money and individual effort has been expended over the last two or three years to enhance the landscape and create opportunities for sustainable development. Wind turbine developments would undo all this good work.

Aim 5 would be compromised by wind farms because recreational, leisure, community and other facilities and projects will not proceed if they are approved.

Policy Context

2.3 In setting and developing its local plan development objectives, the Council has been informed by:

- The Government's commitment to sustainable development.
- All existing national planning guideline and advice contained in the Scottish Executive's series of planning Advice Notes (PANs), National Planning Policy Guidelines (NPPGs) and circulars.

- Existing and emerging Structure Plan Policy.
- The Government's Social Inclusion Strategy.

The Government's commitment to sustainable development and its Social Inclusion Strategy would be gravely undermined if wind turbine developments were allowed to proceed here. Dalmellington and the Upper Doon Valley would be consigned to a future of decline.

Structure Plan Requirements

- To give priority to the use of land within existing settlements for new development.
- To presume against development outwith settlement boundaries except in certain stated circumstances.
- To seek to improve the urban and rural environment.
- To ensure that sites allocated for new development meet certain stated criteria.

The current Structure Plan requirements to presume against development outwith settlement boundaries except in certain stated circumstances and to seek to improve the urban and rural environment are in conflict with proposals which would be dominating and visually intrusive and which would change the character of the landscape.

Sustainability

2.4 The Government's commitment to sustainable development has been of prime importance in the preparation of the East Ayrshire Local Plan, sustainable development being defined as 'development which meets the needs of the present without comprising the ability of future generations to meet their own needs'. National Planning Policy Guidance produced by the Scottish Executive has been a major consideration in the production of the Local Plan and the principles of sustainability enshrined in this Guidance, as described in the NPPG requirements attached to each topic chapter, have been reflected in the preparation of local Plan policy. The Council is keen to promote sustainable forms and patterns of development while conserving natural resources and protecting and enhancing the environment and this approach is a central component of the plan.

2.5 The policies of the Local Plan have been subject to an Environmental Appraisal to ensure that they are compatible with the principles of sustainability and will be used as a basis for future monitoring of the Plan. (See Appendix 1)

The wind turbine development with their dominating impact on the landscape would spell an end to sustainable development projects, both those already completed and

those which are planned. They would therefore compromise the ability of future generations to meet their own needs.

Tourism and related development is believed to be the main hope for the future of the Upper Doon Valley. It is sustainable development and further it encourages ever more care and enhancement of the natural and built environment and thereby an increasingly firm foundation for increased visitor numbers and employment opportunities.

Wind turbine development would thus critically undermine the most likely foundation for sustainable development.

Strategic Development Strategy

2.6 The Local Plan has been produced in full consultation and with the full co-operation of the Ayrshire Joint Structure Plan Committee and the policy approach taken in the Local Plan is fully in accord with the overall Ayrshire – wide strategic planning approach detailed in the approved Ayrshire Structure Plan. In order to meet the primary aims of the Local Plan, reflecting Structure Plan requirements, the Plan:

- Promotes Kilmarnock and Cumnock as the primary locations for all major residential, economic, commercial, cultural, educational and community development.
- Targets the following areas for priority integrated action:
 - Kilmarnock
 - Irvine valley
 - Upper Doon Valley
 - Former mining settlements of the Cumnock Area.
- Identifies and promotes Rural Protection Areas and Rural Diversification Areas as a basis for dealing with rural planning related matters.
- Adheres to the principles of sustainability.

Social Inclusion Partnership Areas

2.7 An East Ayrshire Social Inclusion Partnership has been established under the Government's Social Inclusion Strategy, the Partnership aiming to tackle the physical, economic and social renewal of the area in an integrated and co-ordinated manner. The East Ayrshire Local Plan has an important role to play in achieving these aims, by providing the planning framework for the development of new and expanded facilities to meet the needs of excluded communities, especially through the environmental improvement of the less attractive communities and improvement of poor neighbourhood services and other facilities.

The Local Plan targets the Upper Doon Valley as one of its four areas for priority integrated action.

It is a Social Inclusion Partnership Area, where the aim is to develop new and expanded facilities of excluded communities, especially through environmental improvement.

As detailed earlier, so much has already been achieved in beginning to heal the scars of the past and to enhance the natural environment. It would be very sad, and contrary to policy, if this good work were to be undone by the development of wind farms.

Strategic Development Policies

Policy SD1

The Council will adhere to the principles of sustainability in their consideration of all development proposals.

Sustainable Development for the Upper Doon Valley is not compatible with proposals which would mortally impact on tourism, seen as the most promising prospect for sustainable job creation and prosperity.

The only jobs likely to be generated by the developments are short term and unskilled during the construction process. They are certainly not sustainable and the proposals would destroy the foundations of sustainable development.

Policy SD2

There will be an over-riding presumption that all new developments will be located within the East Ayrshire settlements, unless the development is acceptable to the Council in terms of Policies SD3 and SD4 below.

Policy SD3

Within the Rural Protection Area, development proposals relating to land located outwith settlement boundaries will be acceptable to the Council only where the development:

- i) Comprises an acceptable form of residential use as detailed in Policy RES13 of the Local Plan; or
- ii) Can be fully justified in terms of site specific locational need; or
- iii) Can be fully justified in terms of social and economic benefit to the community; or
- iv) Contributes to rural land diversification; or
- v) Provides for the operational needs of agriculture or forestry.

Policy SD4

Within the Rural Diversification Area, development proposals relating to land outwith settlement boundaries will be acceptable to the Council where the development:

- i) Comprises an acceptable form of residential use as detailed in policy RES14 of the Local Plan; or
- ii) Provides for sensitive industrial, business, recreational or tourism development with a site specific locational need; or
- iii) Can be fully justified in terms of social and economic benefit to the community.

Policy SD5

The Council will positively encourage the integration of complimentary and compatible land uses for residential, work and recreational purposes wherever feasible, so as to reduce the number of individual journeys made by car.

Development at the nodes of existing or potential public transport routes and

development in support of the retention or provision of services and facilities of value to local communities will be particularly encouraged.

Policy SD6

The council will positively encourage the re-use and redevelopment of brownfield land, both in the area settlements and in the rural area, in preference to the development of Greenfield sites. The release of Greenfield land for development will require to be fully justified and will be supported only where an alternative, developable brownfield site is not readily available, marketable or capable or development for the purposes envisaged.

Policy SD7

The Council will positively support, encourage and promote the sympathetic upgrading, re-use and conversion of existing properties, both within the area settlements and throughout the rural area, in preference to the construction of new build properties.

Reasons for Policies SD1 to SD7

The Council will prepare a long term future development strategy for Kilmarnock, giving specific consideration to those potential areas of growth particularly to the north of the town but also to the south and west. All possible development sites within the overall Kilmarnock area will be investigated for their potential to meet housing, economic and other requirements to 2012 and a master plan approach for such an investigation will be pursued. A partnership approach in the preparation of such a master plan in conjunction with the private sector and relevant stakeholders will be adopted. Any proposals or planning applications for future development in Kilmarnock will need to accord with the Local Plan which may be approved by the Council.

Reasons for Policy SD8

- To assess the potential of Kilmarnock to absorb future long term development and to capitalise on future sustainable development opportunities.
- To assist service providers, at an early date, in the preparation of their long term development strategies to provide adequate service infrastructure to meet the needs of future development in the area.

Wind turbine developments which would prevent the economic regeneration of the Upper Doon Valley and are contrary to Policies SD2 and SD4. In particular, they cannot be justified in terms of social and economic benefit to the community; the reverse is the case.

Working in East Ayrshire

NPPG2 Requirements

- To give priority to job creation and economic development.

- To provide an adequate supply, choice and range of marketable land for business and industry.
- To ensure that business and industrial development does not damage the environment.
- To allocate sites in locations accessible by public transport.
- To meet the needs of indigenous developers and the inward investor.

There is an NPPG2 Requirement to give priority to job creation and economic development. Wind farms would result in the direct loss of a minimum of 20 full time jobs and untold future ones.

Business and Industry Development Strategy

3.7 In order to achieve the main business and industrial aims of the Local Plan which are to facilitate the expansion and diversification of the East Ayrshire economy and to maximise its industrial potential, the Plan:

- Directs all strategic industrial development to sites within the Kilmarnock and Cumnock / Auchinleck area.
- Identifies suitable industrial locations throughout East Ayrshire to meet local needs.
- Directs major office developments to Kilmarnock
- Encourages the development of rail freight based industries at existing coal disposal points and other appropriate locations on the rail network.

The Business and Industry Development Strategy (3.7) encourages ‘the diversification of the rural economy with other sensitive uses of land’ and ‘working from home’.

Development of wind farms would discourage and indeed prevent any rural diversification project based on tourism or attracting visitors.

They will also discourage working from home. People who are able to work from home are able to choose where they live. They will choose areas of high amenity and communities with life and vitality. They will not choose areas of blighted landscape or communities whose hopes for the future are dashed. Communities without hope have high rates of anti social behaviour.

Wind farms would have a negative impact on property prices, making it unattractive for developers to build high quality houses.

Policy IND10

All proposals for industrial and business developments in the countryside will require to be justified and will be assessed against their impact on the surrounding environment and adjacent uses, transportation and infrastructure implications, loss of prime agricultural land and impact on natural built heritage resources.

Reason for Policy IND10

- To sustain, enhance and diversify the rural economy of the area.

It is difficult to justify wind farms within this area. They would lead to loss of jobs, a block to regeneration and damage to the character of the landscape. There are already many wind farms, either existing or approved in Ayrshire, and the Upper Doon Valley has already paid a heavy price through its contribution to the nation’s energy needs.

There are currently, we understand, over 350 applications for wind farm developments, of which few can threaten such harm to a community as those proposed here, or any others in the future.

Tourism, Leisure and Recreation.

Prime Objective.

4.1 The Council is committed to exploiting the considerable potential of East Ayrshire for further tourism, leisure and recreational growth and will:

- Expand and diversify the economic base of the area through the development of tourism.
- Improve the quality of life for both residents and visitors through the development of tourism.
- Promote East Ayrshire as a tourist and visitor destination in its own right.

The potential for tourism and its sustainable job creation generated by it are summarised in above.

There is a very strong potential for tourism based regeneration in Dalmellington and the Upper Doon Valley. Several exciting projects are already underway. To attract tourists and to make tourism related regeneration viable and sustainable, we must protect and enhance the landscape and the built environment. This will have the effect not only of attracting increasing numbers of visitors to this area on its own merits but also making it a viable proposition to create new visitor attractions and so bring in many more tourists. This has clear knock on benefits to the economy of the area as a whole.

Wind farms would dominate the landscape and fatally overshadow the wildness of the hills and the potential of the unspoilt wilderness around Loch Doon. They would be visually intrusive and would damage the setting of the Designed Landscape of Craigen Gillan, one of only four in East Ayrshire and one where two of the tourist related projects are situated. These are the creation of an outdoor Curling Centre, which will be the first in Britain, and the creation of an environmental and outdoor activities centre. Both will meet the second of the Prime objectives. Neither will proceed if wind farms are developed here.

Promotion of tourism in the Upper Doon Valley and the development of wind farms here are incompatible.

NPPG Requirements

- To provide sustainable 'green' tourism.
- To consider tourism as an element in rural regeneration.
- To target areas where tourism will be a positive force for environmental protection and enhancement.
- To improve the quality of small towns as tourist destinations.

- To meet the sporting and recreational needs of residents and visitors.
- To safeguard open space and existing facilities and resources for sport and recreational uses.
- To adopt a sequential approach to commercial leisure developments.
- To protect and promote footpaths and rights of way for access and recreational use.

Dalmellington and the Upper Doon Valley have tremendous potential for ‘green’ tourism. Among the natural assets are:

- A beautiful landscape of hills, woods, lochs and rivers.
- A Designed Landscape.
- A rich history, including the Covenanted and Mining trails.
- Dunaskin Heritage Centre.
- Five Sites of Special Scientific Interest.
- Fishing in the river Doon and the many hill lochs.
- Nearly 100 archaeological sites, including mediaeval field systems, a First World War airfield on the Promised Land next to the village, an ancient Motte, Bronze Age burial mounds and a crannog.
- A riding centre, newly established and already attracting visitors from far away who come because of the rare opportunities to ride through miles of unspoilt upland wilderness.
- Ness Glen Gorge, described as the finest example of a natural river gorge in Southern Scotland. An historic path through the glen has just been restored and is open for public access. The proposed turbines would be clearly visible from this path and would take away from the experience of dramatic wilderness, which attracted so many tourists in Victorian times and is likely to do so again.
- The second hand and antiquarian bookshops within Dalmellington.
- Grade A Listed buildings open to the public.
- The spectacular Dalcairney Falls.
- Three of the seven major existing visitor attractions and related facilities in East Ayrshire as detailed in 4.7.

As stated under 4.7, great opportunities exist to tap this largely unspoilt potential. The type of visitor attracted to these natural assets however will be discouraged by a landscape dominated by wind turbines.

4.3 The tourism, leisure and recreational profile of East Ayrshire is characterised by:

- The existence of a wide range of tourism resources which remain unexploited and under-developed.
- Deficiencies in the range, quality and variety of tourist accommodation and other related facilities.
- A lack of particular leisure and recreational facilities in certain areas.

- Areas of high scenic quality and nature conservation interest containing little tourism related infrastructure.
- Large tracts of open countryside, especially attractive to hill walkers, cyclists and anglers.

4.3 highlights amongst other things a lack of particular leisure and recreational facilities. Two projects at the advanced planning stage will do much to remedy this. The Outdoor Curling Centre will be unique in Britain and is forecast to attract upwards of 10,000 visitors a year from Scotland and abroad. It will also be a major recreational and sporting resource for the local community. The Environmental and Outdoor Activity Centre will also fulfil these roles. Neither will be able to proceed if wind farms are developed, as visitors are attracted by unspoilt scenery as well as by the projects themselves.

4.8 In order to facilitate the expansion and diversification of the East Ayrshire economy and to maximise the economic potential of the area for substantial tourism development, the Plan:

- Promotes the Doon and Irvine Valleys as tourism gateways to East Ayrshire and, in particular, encourages tourism related developments relating to the industrial heritage of both areas.
- Promotes and encourages tourism related developments pertaining to the high scenic and landscape quality of the area, and particularly in:
 - The Loch Doon area, comprising one of the last areas of wilderness in the south of Scotland.
 - Glen Afton
- Promotes and encourages natural heritage based green tourism in areas of high nature conservation interest particularly:
 - The Muirkirk Uplands, recommended by Scottish Natural Heritage as a candidate Special Protection Area to meet the Government's European requirements.
 - The River Nith area which is of significant ornithological interest.
- Promotes strategic cycle route and footpath links with the national cycle and footpath networks.

Under 4.8, the Local Plan promotes the Doon Valley as one of two tourism gateways to East Ayrshire and 'promotes and encourages tourism related developments relating to the high scenic and landscape quality of the area and particularly in the Loch Doon area, comprising one of the last areas of wilderness in the South of Scotland'.

Wind farms would severely damage the landscape. They would be visually intrusive and would dominate and affect the views from the A713 'Tourist Route' from every approach. They would be visible from and detract from the very wildness that makes the country around Loch Doon an area of such visitor potential.

Dalmellington and the Upper Doon Valley contain 7 of the 9 Areas of Tourist Potential tabled under 4.9. The potential is clear and strong. To tap it requires enhancement of the natural heritage and landscape. Wind farms would largely destroy it, for no benefit to the community.

Policy M4 relates to Minerals, but the principles behind (ii) and (iv) are relevant to the proposed wind farms.

M4 (ii) States that “the impact of the development on the natural and built heritage, including wildlife and other sites of nature conservation interest, historic gardens and designed landscapes, the visual amenity and the landscape character of the area”.

M4 (iv) states that “any cumulative impact of the development either concurrently or successively in association with other similar developments in the vicinity of the site;”

The existing wind farm at Windy Standard (plus the proposed extension) and Ardrossan are already extremely visible from nearly all parts of the higher ground here. The cumulative impact of wind farms in the Upper Doon Valley would damage the beauty of these uplands and make inward tourism most unlikely.

Housing

Composition of the housing Land Supply.

6.16 The Local Plan has identified a range of sites to meet the needs of both the public and private sectors and the requirements of both the larger scale volume builder and the smaller developer. The Housing Land Supply includes sites suitable for the following types of development.

- (i) General Needs Housing; The Local Plan identifies sites throughout the area settlements for general needs purposes. These sites have been selected where they can:
 - Be fully integrated into existing settlement infrastructure.
 - Contribute positively to the overall visual amenity of the area.
 - Fully respect the landscape and environmental quality of their surroundings.
 - Best support or minimise strain on existing community facilities and other services.
- (ii) Special Needs Housing: Although much of the demand for Special Need Housing can be met through the conversion of existing property, a number of housing sites located close to shopping facilities and other local services are specifically safeguarded for new build special needs housing provision by both the Council, in partnership with Scottish Homes and registered social landlords and by private housing developers. The design of new general needs housing to barrier free standards to be capable of conversion to meet special needs, would also assist in meeting demand for this type of development.
- (iii) Affordable Housing. Under the auspices of the East Ayrshire New Housing Partnership, a number of sites will be developed as a first phase of a programme of housing for rent and low cost housing for sale. These sites are specifically identified for such purposes in the Local Plan.
- (iv) High Amenity Housing. The availability of housing in the upper market range is seen as important for both inward investment purposes and for the retention of professional managers and executives in the area. The Plan specifically identifies and safeguards sites for high amenity housing and also recognises that the conversion of existing large listed buildings, together with any associated enabling development, may also make a contribution to the supply of such housing.

6.16 recognises the need for High Amenity Housing. Experience elsewhere in the country shows that wind farm developments have a negative impact on property

values. Developers will therefore be wary about creating houses of high amenity and good architectural quality in such areas.

A sustainable regeneration based on tourism will bring jobs, prosperity and renewed pride in the community. This will lead to increased care and conservation of existing buildings and the creation of new homes of higher architectural and construction quality. As stated earlier, wind farms would preclude this regeneration.

Community and Service Infrastructure

8.2 NPPG Requirements

- To provide positively for renewable energy developments where this can be achieved in an environmentally acceptable manner.
- To establish an adequate network of treatment and disposal installations to handle waste arisings as close as possible to the point of production.

8.2 sets out an NPPG Requirement . IN the landscape of hills, lochs and forests within which Dalmellington lies, wind farms would dominate the settlements and major potential tourist areas of Dalmellington and the Upper Doon Valley. They would be visually intrusive, they would dominate the landscape and prevent sustainable development based on tourism.

This area already contributes renewable energy through the Loch Doon hydro scheme and there is also great potential for energy crops such as short rotation including willow coppice, on ground restored following opencast coal extraction. These forms of renewable energy do not impact on the natural environment or the landscape. The area can therefore continue to play its part in contributing renewable energy without destroying its future.

8.5 states that “While supportive of renewable energy projects, it is considered imperative that the more sensitive parts of the rural area in terms of landscape quality, nature conservation and heritage interest are adequately protected. The potential impact of wind farm development on the environment and visual amenity of the area is of particular concern to the Council.”

This beautiful and sensitive area should be protected from wind turbines. The first green shoots of regeneration here are fragile and the future of Dalmellington is in the balance. Given support and encouragement the spirit of the community and the natural assets of our landscape will lead to an exciting and sustainable future based primarily on tourism. Wind farms would destroy this prospect and the present hopes of recovery from the wounds of the past would be dashed.

Policy CS8 states that “The Council will be supportive of Renewable Energy developments within the Local Plan area.”

The Upper Doon Valley has contributed renewable energy from the hydro scheme at Loch Doon for over 70 years and there is potential for energy crops such as short rotation willow coppice, including on areas restored following opencast operations.

Policy CS8 (ii) states that “In existing or proposed Sites of Special Scientific Interest (SSSI’s) and Environmentally Sensitive Areas (ESA’s), where it can be clearly demonstrated that:

- Any underlying objective and overall integrity of the designed area will remain largely unaffected; or
- Any adverse effects on the environmental qualities for which the site has been designated are outweighed significantly by the national benefits that could accrue from the development.

Much of the countryside around Dalmellington forms part of the Western Uplands ESA. The overall integrity of this designated area would be fatally compromised by wind farms. The national benefits of renewable energy schemes can and are being met by non-wind power means. There are other sites in Ayrshire already producing wind power and within the country as a whole there are sufficient sites capable between them of meeting the Government's targets without the tragic effects that these developments would have on this community.

Policy CS9 states that “ All wind farm, wind turbine and other renewable energy developments will be rigorously assessed against the following criteria:

- (i) The extent to which the development may adversely affect any sites of nature conservation interest and, in particular, the natural habitat, territory and breeding areas of upland birds;
- (ii) The extent to which the amenity of residents of nearby towns, villages and other residential properties may be adversely affected by reason of noise emission, visual dominance and other nuisance;

Wind farms would visually dominate the settlements and landscape of Dalmellington and the Upper Doon Valley. They would most seriously detract from the amenity of residents and would prevent the regeneration of the community which is otherwise promised.

- (iii) The extent to which the development may adversely affect any recognised heritage resources, including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Archaeological Sites and Historic Gardens and Designed Landscape and their individual settings;

Wind farms would adversely affect:

- a) The setting of many Listed Buildings, including the Grade A Dunaskin Heritage Centre and Craigengillan, two of the focal points for the sustainable regeneration of the community.
- b) The Conservation Area of Dalmellington.
- c) Scheduled Ancient Monuments including Dalnean Hill.
- d) Nearly 100 Archaeological Sites.
- e) The Designed landscape of Craigengillan.
- (iv) The visual impact of the proposal and its setting within the immediate and wider natural landscape:

Wind farms in the Dalmellington area would have a damaging and major visual impact on the Sensitive Landscape Area, designated as a Safeguarded Area in the Local Plan.

- (v) The extent to which the proposal may conflict with the Council's strategy to promote tourism related developments in the Doon and Irvine Valleys, Glen Afton and the Muirkirk Uplands;

Wind farm developments would be in direct conflict with the Council's Strategy to promote tourism related developments in the Doon Valley; they would prevent them from happening.

- (vii) The cumulative impact of the proposal with other existing or authorised renewable energy developments within the vicinity of the development site;

The existing wind farm developments at Windy Standard and Ardrossan are clearly visible from much of the Upper Doon Valley.

Environment

There are many sections under this heading of the Local Plan which are relevant:

Prime Objective

10.1 The council is committed to protecting, conserving and enhancing the character, appearance and amenity of the natural and built environment of East Ayrshire for future generations. The key elements to be addressed in this regard are:

- Built heritage
- Townscape and design
- Natural heritage
- Landscape and the rural environment
- Environmental protection

Policy Context

10.2 The Environment Section is set within the context of NPPG5: Archaeology & Planning; NPPG14: Natural Heritage; NPPG18: Planning and the Historic Environment; and NPPG7: Planning & Flooding. Pan33: Development of Contaminated Land and PAN51: Planning and Environmental Protection have also been used as a basis for formulating the Council's approach to environmental protection issues. The Plan also meets the requirements of the Ayrshire Joint Structure Plan in terms of environmental protection, conservation and enhancement.

NPPG Requirements.

- To encourage the preservation of sites and landscapes of archaeological and historic interest.

The settings of the Scheduled Site at Dalnean Hill and the Craigengillan Designed Landscape would be greatly damaged by wind farms within the Dalmellington area.

- To safeguard historic properties and the historic environment from inappropriate development.

The settings of the Grade A Listed Dunaskin Heritage Centre and Craigengillan would be severely affected by wind turbine developments.

- To promote the continued use of historic property and environments.

Craigengillan and its Designed Landscape are a source of pride and benefit to the local community and are the focus for three major tourism related projects which between them will create 20 full time jobs and attract over 20,000 visitors each year to the Upper Doon Valley. These projects would disappear if the wind farm proposals were approved.

- To protect and enhance the landscape quality and natural heritage interests of the area.

Wind farms would seriously damage the landscape quality and natural heritage interests of the area.

- To guide, regulate and control development in areas at risk of flooding.

Relevant Structure Plan Requirements are:

- To conserve and enhance local landscape character.
- To define Sensitive Landscape Areas and policies for their protection and enhancement.

Wind farms within the Dalmellington area lie within and adjacent to Sensitive Landscape Areas, which are Safeguarded Areas. Whereas they would be adjacent, their structures are so visually dominant as to affect them as much as if they were sited within them.

- To interpret and promote the archaeological locations at Muirkirk and the Upper Doon Valley.

The Settings of these locations, an important factor in the development of 'green' tourism in the area, would be gravely compromised by wind turbine developments.

10.3 A High quality physical environment is an important factor in attracting investment and the Council is committed to protecting those elements of the natural and built environment which contribute positively to the intrinsic quality and character of the area.

10.4 affirms that "A High quality physical environment is an important factor in attracting investment and the Council is committed to protecting those elements of the natural and built environment which contribute positively to the intrinsic quality and character of the area."

The hills of the Upper Doon Valley are a major part of its natural character. The SSSI at Ben Beoch is notified for its geological interest, but is also a strong landscape feature; a rare rock formation similar to Fingal's Cave on Staffa.

The great Scottish Judge, educationalist and philosopher visited Dalmellington in 1844. He wrote "When the time shall come (as come it will) when Southern cottages or southern neatness shall be introduced into Scotland, what a village Dalmellington may be. A few old trees, irregular ground, tumbling burns, a spire, and a mill – what more is wanted? Three years later, Cockburn grieved for progress: It has the appearance, and the reputation of being a singularly virtuous and happy village; and I am told is perhaps the last place in Ayrshire where, with a good deal of old primitive manufacture, rural simplicity and contentment still linger. But it is now to taste of manufactures in an improved state. The devil has disclosed his iron, and speculation has begun to work it. There seemed to be about a dozen of pits sinking within half a mile of the village, and before another year is out those now solitary and peaceful hills will be blazing with furnaces, and blighted by the presence and the vices of a new population of black scoundrels. They were many indignant knolls. Ironworks and coalmines have come and gone. The little town remains depressed and neglected, and the peaceful and solitary hills are being carted away in the search for opencast coal."

The last paragraph was written in 1992 by Rob Close in 'Ayrshire and Arran' – RIAS. Since then the hope of regeneration has developed and several exciting projects are underway. Wind turbine developments would extinguish this hope and finish these projects in their tracks.

- 10.5 Those elements that contribute to the built heritage of East Ayrshire comprise:
- Conservation Areas
 - Listed Buildings
 - Ancient Monuments and Archaeological Sites
 - Historic Gardens and Designed Landscapes.

The Settings of the Conservation Area of Dalmellington, the many Listed buildings, the Ancient Monuments and Archaeological Sites and the Designed Landscape of Craigenkillan, all so important to the sustainable development of the Upper Doon Valley for tourism, would be greatly damaged by visually dominating wind turbines.

10.17 The Local Plan recognises the importance that areas of natural heritage can play in the economic regeneration of the area, particularly through the development of green tourism as described in the Tourism, Leisure and Recreation section of the Plan.

Natural Heritage Designations

Special Protection Area	1
Special Area for Conservation	2
SSSI's	19
Provisional Wildlife Sites	111
Local Nature Reserves	2

Five of the nineteen SSSI's in East Ayrshire (26%) lie within very close proximity to Dalmellington, together with one of the region's two Local Nature Reserves and a huge swathe of country designated as a Provisional Wildlife Site. Green tourism and a landscape dominated by semi-industrial development do not coincide.

Landscape and the Rural Environment

10.19 East Ayrshire contains a wide diversity of landscapes comprising:

- Areas of extensive heather uplands
- Large coniferous forestry plantations
- Attractive river valleys
- Estate lands and designed landscapes with associated mixed and broadleaved woods.
- Agricultural land with traditional field patterns, mature hedgerows and shelter belts, hedgerow trees and scattered woods.

Maintenance of the character and qualities of each particular landscape type within East Ayrshire has been a prime consideration in the formulation of all Local Plan Policies relating to the development and use of land.

Dalmellington and the Upper Doon Valley contains a rich variety of landscape within a comparatively small area. This is a major draw for tourism and creates an environment of high amenity for those who live and work here. It is a fragile and sensitive landscape however. It has just survived the effects of its industrial past, but would not survive further intrusion and dominance.

10.20 Although parts of East Ayrshire are considered to be of high landscape value, there are no statutory landscape designations within the area. A Landscape Character Assessment for Ayrshire has been produced and adopted by the Council, which identifies a total of 13 distinct landscape types in East Ayrshire. This Assessment has been instrumental in the identification of Sensitive Landscape Character Areas in the Local Plan within which priority is given to the protection and enhancement of the landscape particularly with regard to its overall scenic quality, the unspoilt nature and heritage interest of the area and its contribution towards a definite sense of place. The Sensitive Landscape Character Areas indicated on the key diagram on the approved Ayrshire Joint Structure Plan. The Local Plan defines these areas more precisely on the ground, using natural and other topographical features such as roads, field boundaries, streams etc. to delineate precise boundaries for the areas concerned. The Sensitive Landscape Character Areas are indicated on the Local Plan maps.

Wind farms within the Dalmellington area would either fall within the Sensitive Landscape Area or be so close to it that, bearing in mind the sheer scale of the turbines, equivalent to 50 storey office blocks, they would completely dominate it.

10.21 There is a considerable legacy of dereliction in the rural parts of East Ayrshire with untreated bings associated with past mining activity and derelict buildings and land associated with other industrial operations having a detrimental impact on the rural environment. Rehabilitation of these sites is urgently required although it is

recognised that some bing areas have regenerated naturally and may be of some nature conservation interest.

- 10.22 The Plan also seeks to protect the landscape as an important element in the economic regeneration and diversification of the area, particularly for leisure, recreational and tourism purposes.

Far from rehabilitation, dominating wind turbine developments would reinforce the past abuse of the landscape. They would prevent the planned economic regeneration of the Upper Doon Valley.

Environmental Development Strategy

- 10.28 East Ayrshire Council is committed to protecting, conserving and enhancing the character, appearance and amenity of East Ayrshire, especially as regards its landscape quality, the built and natural environment and areas of natural heritage and built heritage importance. This will be achieved by:
- Targeting the main strategic access and tourist routes for environmental treatment and improvement.
 - Working in collaboration with local communities to prepare and implement appropriate Environmental Improvement Action Plans for those areas suffering especially from problems of poverty, decline and social exclusion.

The Upper Doon Valley is defined in the Plan as a strategic access and tourist route. Wind turbines would therefore be in direct conflict with the Environmental Development Strategy.

Built Heritage Policies

Policy ENV1

The Council will seek to protect, preserve and enhance all heritage resources requiring conservation including Listed Buildings and Conservation Areas, together with their respective settings, Scheduled Ancient Monuments and Archaeological and Industrial Archaeological Sites and Landscapes.

Policy ENV4

The Council will seek to ensure that all development within or affecting the setting of a Conservation Area or affecting the appearance or setting of a Listed Building, is sympathetic to the area or building concerned in terms of its layout, size, scale, design, siting, materials and colour of finish. Wherever possible, all proposals should seek to preserve, enhance or incorporate features, which contribute positively to the character or appearance of the area and have due regard to the architectural and historic qualities of the area or building concerned.

Reason for Policy ENV4

- To ensure that the new development is sympathetic to the character of existing buildings and areas of architectural and historic interest.

The large scale, dominating and visually intrusive nature of wind turbine developments would have a marked and adverse effect on the settings of Listed Buildings, many of them Grade A, Conservation Areas, Scheduled Ancient Monuments including Dalnean Hill, over 100 Archaeological Sites including the Dunaskin Heritage Centre and landscapes including the Designed Landscape of Craigenkillan.

Policy ENV6

The Council will actively encourage and support the improvement and enhancement of the natural and built environment in accordance with the Local Plan Environmental Development Strategy.

Reason for Policy ENV6

- To direct environmental improvements to those areas most in need.

This policy recognises the importance of improving and enhancing the environment in facilitating economic regeneration through tourism and inward investment.

Wind turbine developments, far from improving or enhancing the landscape, would dominate it and reinforce the scars of the industrial past and the rape of the landscape. Dalmellington is a SIP Area with high unemployment. Sustainable economic regeneration through tourism and inward investment is what it needs.

Wind farms here would be developments are contrary to the Policy ENV6.

Landscape and Rural Environment Policies

Policy ENV11

Within the Sensitive Landscape Character Areas identified on the Local Plan maps, the council will give priority and prime consideration to the protection and enhancement of the landscape in consideration or rural development proposals. The Council will not be supportive of development which would create unacceptable visual intrusion or irreparable damage within these areas and will be supportive of development proposals only where these positively enhance or protect the natural landscape, wildlife and cultural heritage of the area or promote the social and economic well-being of communities.

Policy ENV12

Throughout the rural area, and especially in the Sensitive Landscape Character Areas identified on the Local Plan maps, the Council will ensure that all development proposals respect, in terms of their design, the local landscape characteristics of the particular area within which they are proposed. Developers will be expected to conserve and enhance, and reinstate or replace where appropriate, those features

which contribute to the intrinsic landscape value and quality of the area concerned, including:

- (i) Existing setting of settlements and buildings within the landscape.
- (vi) Existing skylines, landform and contours.

Wind turbine developments would be almost certain to dominate the skyline and would damage very severely the settings of Dalmellington, Burnton, Waterside and Patna.

Monitoring, Evaluation and Review.

11.1 It is essential that the range of policies, proposals and recommendations identified in the Local Plan are fully implemented in order:

- To achieve the regeneration of East Ayrshire
- To enhance the amenity and environment of the area; and
- To improve the quality of life of local residents.

As described above, wind turbine developments are contrary to the Local Plan. They would:

- Prevent the regeneration of the Upper Doon Valley.
- Dominate and severely damage the amenity and environment of the area.
- Through immediate loss of jobs, loss of the prospect of sustainable economic generation and through the scarring of the landscape, the quality of life of local residents would be made greatly worse and the hopes for the future would be dashed. The community would enter a downward spiral of decline.

General grounds for objection.

Over the last 190 years Dalmellington and the Upper Doon Valley have paid a high price in helping to produce and carry the nations energy requirements. The ironworks, the deep coalmines and more recently opencast extraction and the electricity interconnector pylon line have made heavy scars on the landscape. The effect of these scars is to reduce the amenity of the area as a place to live, work and enjoy. This made it harder to attract the new investment which was so greatly needed following the closure of the deep mines, with the result that unemployment has been very high.

APPENDIX 1.

East Ayrshire Local Plan and how turbine proposals sit with policies therein.

The East Ayrshire Council Commitment

The Council has adopted as its key values ‘Quality, Equality, Access and Partnership’. In serving the people of East Ayrshire this Council will seek:

- To eliminate poverty, deprivation and unemployment

Two current applicants, Scottish Coal and Amec have confirmed that their proposed wind farm would produce no local jobs once construction is complete. The same is likely to be the case for any other would-be developer.

Wind farm developments would cost the area many jobs, by blighting the landscape, and preventing regeneration based on tourism.

- To protect the weak and vulnerable in every community
- To secure a quality environment for living and working

Wind farms, particularly the new generation of 100 - 130m turbines would dominate the skyline above Dalmellington, Bellsbank, Waterside, Polnessan, Patna and the surrounding countryside. They would destroy the new found pride and love among the local community of the beautiful countryside of the Upper Doon Valley. They would counter all the environmental improvements and regeneration projects carried out over the last few years by local volunteers, farmers and organisations such as the Minerals Trust, The Dalmellington Partnership, East Ayrshire Council, SNH, SIP, the Forestry Commission and others. These include:

- Landscaping of the Bogton Mine bing followed by tree planting.
- Replanting of historic native woodland between Bellsbank and Dalmellington.
- Creation of a Community Garden in Dalmellington.

- Restoration of Grade A Listed buildings and Designed Landscape at Craigenkillan.
- Planting of trees and creation of footpath with wheelchair access along the Muck Water.
- Creation of carefully planned 250 acre native woodland on Aucheny Hill to improve the landscape and the setting for Dalmellington and Bellsbank and to create additional wildlife habitat.
- Creation of a public footpath through the dramatic and magnificent Ness Glen. This project is the result of a partnership between the owner, the Forestry Commission, SNH, East Ayrshire Woodlands, the Scouts, Minerals Trust and SIP.

The river gorge, which is also a SSSI, was famous in Victorian times and attracted many visitors to the area. It is expected that it will do so again.

- Establishment of over 15 miles of new hedging on the hill pastures surrounding Dalmellington to enhance the landscape and the habitat for wildlife.
- Planting of a long avenue of Oak and Lime trees along the public road between Waterside and Dalmellington.
- Rebuilding over 3 miles of the stone dykes which are a feature of the local landscape.
- Positive management of the four SSSI's which will become an important part of the ecotourism planned for the area.
- Restoration of Listed Stables building to establish a horse livery and trekking business that has already created two permanent jobs, with a further two in near prospect.
- Positive management and enhancement of the rich archaeological heritage of the Upper Doon Valley which ranges from Bronze Age burial sites, Mediaeval field systems creating a fascinating landscape on the Scheduled Monument of Dalnean Hill, an ancient Motte and the Grade A Listed industrial buildings at Dunaskin.
- **To strive for a society based on equality and equal opportunities**

Land Use Development Aspects of the Council's four Corporate Strategies.

Economic Strategy aims to:

- Assist economic development through the provision of attractive sites and premises, through the improvement of physical infrastructure and through the promotion of development opportunities.
- Enhance the image of the area

Dalmellington and the Upper Doon Valley do not enjoy a great image from outside. It is perceived as a rough place with high unemployment, scarred by industrial dereliction and opencast coal workings.

In recent years the image has begun to improve as a result of the many environmental improvements. Events such as the Boxing International and the planned Outdoor Curling Centre, together with existing enterprises such as Dunaskin / the steam railway and the Book Town will increasingly make people from outside and within associate Dalmellington with something positive and exciting.

Wind farm development would reinforce the old and poor image of Dalmellington as an industrial 'dumping ground' and would prove a complete disincentive to further improvement.

- Promote tourism

Wind farms here would be visually intrusive and would detract greatly from the beauty which attracts visitors. They would reinforce the current negative image of the place. To succeed and be sustainable, projects such as those referred to above rely on attracting visitors. If wind farms are developed, projects such as the Curling Centre and Outdoor Activity / Environmental developments will not proceed – Dalmellington in particular and Ayrshire generally will suffer.

- Regenerate local communities

The first green shoots of sustainable regeneration in Dalmellington and the Upper Doon Valley are tender and fragile. They will not be able to withstand the negative

impact of wind turbines. If left alone and encouraged however, the chances of real regeneration are strong.

Communities with a stronger image and with greater prosperity would be seriously affected by such developments but might survive. Dalmellington would not.

Environmental Strategy aims to:

- Maximise the re-use of urban land and buildings and minimise the development of Greenfield sites

Wind farm developments would be likely to occupy Greenfield sites. Present land use is forest, moorland and ground restored following opencast operations. Furthermore, the developments would have a major detrimental impact on neighbouring greenfield areas.

- Safeguard and enhance the natural environment and built heritage

Wind farm developments would do the reverse. With their vast scale, the landscape cannot absorb them. They would dominate the hills and the wild scenery of the Upper Doon Valley as well as the settings of Conservation Areas, Listed buildings and a Designed Landscape.

Social and Equal Opportunities Strategies aim to:

- Address social problems of disadvantage, deprivation and social exclusion

2.2 The Local Plan has a primary strategic aim, which is:

‘To promote sustainable development, to maximise the potential of East Ayrshire and to improve the quality of life of its residents.’

This primary aim is supported by a series of more specific, related aims which endeavour to balance the need for development against the need to conserve the unique character of the area. These aims are:

AIM 1 – To maintain and improve the integrity, vitality and viability of the area settlements and their rural settings.

AIM 2 – To facilitate the expansion and diversification of the East Ayrshire economy and to maximise the economic potential of the area for industrial, business, commercial and tourism development.

AIM 3 – To protect, conserve and enhance the character, appearance and amenity of East Ayrshire, especially as regards its landscape quality, the built and natural environment and areas of natural heritage and built heritage importance.

AIM 4 – To maximise benefits to the area by providing an improved and integrated transportation infrastructure and promoting the development of stronger communication links with the national strategic road and rail networks.

AIM 5 – To provide an adequate supply of effective housing land and associated facilities and services to meet anticipated demand.

AIM 6 – To strengthen and improve the viability and vitality of the strategic retail and office base of East Ayrshire.

The primary strategic aim and four of the six supporting specific ones (Aims 1,2,3 and 5) are at total odds with wind turbine developments.

- The integrity of the area (aim 1) would be severely damaged by such dominating developments, current generation turbines being as high as 50 storey office blocks and nearly four times larger than those at Windy Hill and Harelaw Hill.
- The vitality of the area (Aim 1) would be hurt as a result of the extinguishing of current hopes of regeneration. There would be fewer businesses, fewer or no projects to promote the image of the place and fewer job opportunities for school leavers.
- The viability of the area (Aim 1) would be greatly reduced, as the single greatest perceived area of development – tourism – would be hit on the head

not only because the landscape would be less attractive but also because the projects being planned, which rely on visitor numbers, will not proceed.

- The economy of the Upper Doon Valley specifically, and East Ayrshire generally, would contract if the diversification projects, and the tourists that will come to them, do not materialise. They will not materialise if wind farms are permitted here. Such developments are therefore at odds with Aim 2.
- Wind turbine developments are completely contrary to Aim 3. In addition to the beauty of the surrounding hills as a whole, much of the land around Dalmellington is classified as a Sensitive Landscape Area and thus a Safeguarded Area. Even turbine developments outwith the Sensitive Landscape Area would severely impact onto it due to their large scale. Craigengillan, on the edge of Dalmellington, is one of only 4 Designed Landscapes in East Ayrshire. Its setting would be marred by turbine developments.

Much public and private money and individual effort has been expended over the last two or three years to enhance the landscape and create opportunities for sustainable development. Wind turbine developments would undo all this good work.

Aim 5 would be compromised by wind farms because recreational, leisure, community and other facilities and projects will not proceed if they are approved.

Policy Context

2.3 In setting and developing its local plan development objectives, the Council has been informed by:

- The Government's commitment to sustainable development.
- All existing national planning guideline and advice contained in the Scottish Executive's series of planning Advice Notes (PANs), National Planning Policy Guidelines (NPPGs) and circulars.

- Existing and emerging Structure Plan Policy.
- The Government's Social Inclusion Strategy.

The Government's commitment to sustainable development and its Social Inclusion Strategy would be gravely undermined if wind turbine developments were allowed to proceed here. Dalmellington and the Upper Doon Valley would be consigned to a future of decline.

Structure Plan Requirements

- To give priority to the use of land within existing settlements for new development.
- To presume against development outwith settlement boundaries except in certain stated circumstances.
- To seek to improve the urban and rural environment.
- To ensure that sites allocated for new development meet certain stated criteria.

The current Structure Plan requirements to presume against development outwith settlement boundaries except in certain stated circumstances and to seek to improve the urban and rural environment are in conflict with proposals which would be dominating and visually intrusive and which would change the character of the landscape.

Sustainability

2.4 The Government's commitment to sustainable development has been of prime importance in the preparation of the East Ayrshire Local Plan, sustainable development being defined as 'development which meets the needs of the present without comprising the ability of future generations to meet their own needs'.

National Planning Policy Guidance produced by the Scottish Executive has been a major consideration in the production of the Local Plan and the principles of sustainability enshrined in this Guidance, as described in the NPPG requirements attached to each topic chapter, have been reflected in the preparation of local Plan policy. The Council is keen to promote sustainable forms and patterns of development while conserving natural resources and protecting and enhancing the environment and this approach is a central component of the plan.

2.5 The policies of the Local Plan have been subject to an Environmental Appraisal to ensure that they are compatible with the principles of sustainability and will be used as a basis for future monitoring of the Plan. (See Appendix 1)

The wind turbine development with their dominating impact on the landscape would spell an end to sustainable development projects, both those already completed and those which are planned. They would therefore compromise the ability of future generations to meet their own needs.

Tourism and related development is believed to be the main hope for the future of the Upper Doon Valley. It is sustainable development and further it encourages ever more care and enhancement of the natural and built environment and thereby an increasingly firm foundation for increased visitor numbers and employment opportunities.

Wind turbine development would thus critically undermine the most likely foundation for sustainable development.

Strategic Development Strategy

2.6 The Local Plan has been produced in full consultation and with the full co-operation of the Ayrshire Joint Structure Plan Committee and the policy approach taken in the Local Plan is fully in accord with the overall Ayrshire – wide strategic planning approach detailed in the approved Ayrshire Structure Plan. In order to meet the primary aims of the Local Plan, reflecting Structure Plan requirements, the Plan:

- Promotes Kilmarnock and Cumnock as the primary locations for all major residential, economic, commercial, cultural, educational and community development.

- Targets the following areas for priority integrated action:
 - Kilmarnock
 - Irvine valley
 - Upper Doon Valley
 - Former mining settlements of the Cumnock Area.
- Identifies and promotes Rural Protection Areas and Rural Diversification Areas as a basis for dealing with rural planning related matters.
- Adheres to the principles of sustainability.

Social Inclusion Partnership Areas

2.7 An East Ayrshire Social Inclusion Partnership has been established under the Government's Social Inclusion Strategy, the Partnership aiming to tackle the physical, economic and social renewal of the area in an integrated and co-ordinated manner. The East Ayrshire Local Plan has an important role to play in achieving these aims, by providing the planning framework for the development of new and expanded facilities to meet the needs of excluded communities, especially through the environmental improvement of the less attractive communities and improvement of poor neighbourhood services and other facilities.

The Local Plan targets the Upper Doon Valley as one of its four areas for priority integrated action.

It is a Social Inclusion Partnership Area, where the aim is to develop new and expanded facilities of excluded communities, especially through environmental improvement.

As detailed earlier, so much has already been achieved in beginning to heal the scars of the past and to enhance the natural environment. It would be very sad, and contrary to policy, if this good work were to be undone by the development of wind farms.

Strategic Development Policies

Policy SD1

The Council will adhere to the principles of sustainability in their consideration of all development proposals.

Sustainable Development for the Upper Doon Valley is not compatible with proposals which would mortally impact on tourism, seen as the most promising prospect for sustainable job creation and prosperity.

The only jobs likely to be generated by the developments are short term and unskilled during the construction process. They are certainly not sustainable and the proposals would destroy the foundations of sustainable development.

Policy SD2

There will be an over-riding presumption that all new developments will be located within the East Ayrshire settlements, unless the development is acceptable to the Council in terms of Policies SD3 and SD4 below.

Policy SD3

Within the Rural Protection Area, development proposals relating to land located outwith settlement boundaries will be acceptable to the Council only where the development:

- i) Comprises an acceptable form of residential use as detailed in Policy RES13 of the Local Plan; or
- ii) Can be fully justified in terms of site specific locational need; or
- iii) Can be fully justified in terms of social and economic benefit to the community; or
- iv) Contributes to rural land diversification; or
- v) Provides for the operational needs of agriculture or forestry.

Policy SD4

Within the Rural Diversification Area, development proposals relating to land outwith settlement boundaries will be acceptable to the Council where the development:

- i) Comprises an acceptable form of residential use as detailed in policy RES14 of the Local Plan; or
- ii) Provides for sensitive industrial, business, recreational or tourism development with a site specific locational need; or
- iii) Can be fully justified in terms of social and economic benefit to the community.

Policy SD5

The Council will positively encourage the integration of complimentary and compatible land uses for residential, work and recreational purposes wherever feasible, so as to reduce the number of individual journeys made by car. Development at the nodes of existing or potential public transport routes and development in support of the retention or provision of services and facilities of value to local communities will be particularly encouraged.

Policy SD6

The council will positively encourage the re-use and redevelopment of brownfield land, both in the area settlements and in the rural area, in preference to the development of Greenfield sites. The release of Greenfield land for development will require to be fully justified and will be supported only where an alternative, developable brownfield site is not readily available, marketable or capable of development for the purposes envisaged.

Policy SD7

The Council will positively support, encourage and promote the sympathetic upgrading, re-use and conversion of existing properties, both within the area settlements and throughout the rural area, in preference to the construction of new build properties.

Reasons for Policies SD1 to SD7

The Council will prepare a long term future development strategy for Kilmarnock, giving specific consideration to those potential areas of growth particularly to the north of the town but also to the south and west. All possible development sites within the overall Kilmarnock area will be investigated for their potential to meet housing, economic and other requirements to 2012 and a master plan approach for such an investigation will be pursued. A partnership approach in the preparation of such a master plan in conjunction with the private sector and relevant stakeholders will be adopted. Any proposals or planning applications for future development in Kilmarnock will need to accord with the Local Plan which may be approved by the Council.

Reasons for Policy SD8

- To assess the potential of Kilmarnock to absorb future long term development and to capitalise on future sustainable development opportunities.
- To assist service providers, at an early date, in the preparation of their long term development strategies to provide adequate service infrastructure to meet the needs of future development in the area.

Wind turbine developments which would prevent the economic regeneration of the Upper Doon Valley and are contrary to Policies SD2 and SD4. In particular, they cannot be justified in terms of social and economic benefit to the community; the reverse is the case.

Working in East Ayrshire

NPPG2 Requirements

- To give priority to job creation and economic development.
- To provide an adequate supply, choice and range of marketable land for business and industry.
- To ensure that business and industrial development does not damage the environment.

- To allocate sites in locations accessible by public transport.
- To meet the needs of indigenous developers and the inward investor.

There is an NPPG2 Requirement to give priority to job creation and economic development. Wind farms would result in the direct loss of a minimum of 20 full time jobs and untold future ones.

Business and Industry Development Strategy

3.7 In order to achieve the main business and industrial aims of the Local Plan which are to facilitate the expansion and diversification of the East Ayrshire economy and to maximise its industrial potential, the Plan:

- Directs all strategic industrial development to sites within the Kilmarnock and Cumnock / Auchinleck area.
- Identifies suitable industrial locations throughout East Ayrshire to meet local needs.
- Directs major office developments to Kilmarnock
- Encourages the development of rail freight based industries at existing coal disposal points and other appropriate locations on the rail network.

The Business and Industry Development Strategy (3.7) encourages ‘the diversification of the rural economy with other sensitive uses of land’ and ‘working from home’. Development of wind farms would discourage and indeed prevent any rural diversification project based on tourism or attracting visitors.

They will also discourage working from home. People who are able to work from home are able to choose where they live. They will choose areas of high amenity and communities with life and vitality. They will not choose areas of blighted landscape or communities whose hopes for the future are dashed. Communities without hope have high rates of anti social behaviour.

Wind farms would have a negative impact on property prices, making it unattractive for developers to build high quality houses.

Policy IND10

All proposals for industrial and business developments in the countryside will require to be justified and will be assessed against their impact on the surrounding environment and adjacent uses, transportation and infrastructure implications, loss of prime agricultural land and impact on natural built heritage resources.

Reason for Policy IND10

- To sustain, enhance and diversify the rural economy of the area.

It is difficult to justify wind farms within this area. They would lead to loss of jobs, a block to regeneration and damage to the character of the landscape. There are already many wind farms, either existing or approved in Ayrshire, and the Upper Doon Valley has already paid a heavy price through its contribution to the nation's energy needs. There are currently, we understand, over 350 applications for wind farm developments, of which few can threaten such harm to a community as those proposed here, or any others in the future.

Tourism, Leisure and Recreation.

Prime Objective.

- 4.1 The Council is committed to exploiting the considerable potential of East Ayrshire for further tourism, leisure and recreational growth and will:
- Expand and diversify the economic base of the area through the development of tourism.
 - Improve the quality of life for both residents and visitors through the development of tourism.
 - Promote East Ayrshire as a tourist and visitor destination in its own right.

The potential for tourism and its sustainable job creation generated by it are summarised in above.

There is a very strong potential for tourism based regeneration in Dalmellington and the Upper Doon Valley. Several exciting projects are already underway. To attract

tourists and to make tourism related regeneration viable and sustainable, we must protect and enhance the landscape and the built environment. This will have the effect not only of attracting increasing numbers of visitors to this area on its own merits but also making it a viable proposition to create new visitor attractions and so bring in many more tourists. This has clear knock on benefits to the economy of the area as a whole.

Wind farms would dominate the landscape and fatally overshadow the wildness of the hills and the potential of the unspoilt wilderness around Loch Doon. They would be visually intrusive and would damage the setting of the Designed Landscape of Craigengillan, one of only four in East Ayrshire and one where two of the tourist related projects are situated. These are the creation of an outdoor Curling Centre, which will be the first in Britain, and the creation of an environmental and outdoor activities centre. Both will meet the second of the Prime objectives. Neither will proceed if wind farms are developed here.

Promotion of tourism in the Upper Doon Valley and the development of wind farms here are incompatible.

NPPG Requirements

- To provide sustainable ‘green’ tourism.
- To consider tourism as an element in rural regeneration.
- To target areas where tourism will be a positive force for environmental protection and enhancement.
- To improve the quality of small towns as tourist destinations.
- To meet the sporting and recreational needs of residents and visitors.

- To safeguard open space and existing facilities and resources for sport and recreational uses.
- To adopt a sequential approach to commercial leisure developments.
- To protect and promote footpaths and rights of way for access and recreational use.

Dalmellington and the Upper Doon Valley have tremendous potential for ‘green’ tourism. Among the natural assets are:

- A beautiful landscape of hills, woods, lochs and rivers.
- A Designed Landscape.
- A rich history, including the Covenanting and Mining trails.
- Dunaskin Heritage Centre.
- Five Sites of Special Scientific Interest.
- Fishing in the river Doon and the many hill lochs.
- Nearly 100 archaeological sites, including mediaeval field systems, a First World War airfield on the Promised Land next to the village, an ancient Motte, Bronze Age burial mounds and a crannog.
- A riding centre, newly established and already attracting visitors from far away who come because of the rare opportunities to ride through miles of unspoilt upland wilderness.
- Ness Glen Gorge, described as the finest example of a natural river gorge in Southern Scotland. An historic path through the glen has just been restored and is open for public access. The proposed turbines would be clearly visible from this path and would take away from the experience of dramatic wilderness, which attracted so many tourists in Victorian times and is likely to do so again.
- The second hand and antiquarian bookshops within Dalmellington.
- Grade A Listed buildings open to the public.
- The spectacular Dalcairney Falls.

- Three of the seven major existing visitor attractions and related facilities in East Ayrshire as detailed in 4.7.

As stated under 4.7, great opportunities exist to tap this largely unspoilt potential.

The type of visitor attracted to these natural assets however will be discouraged by a landscape dominated by wind turbines.

4.3 The tourism, leisure and recreational profile of East Ayrshire is characterised by:

- The existence of a wide range of tourism resources which remain unexploited and under-developed.
- Deficiencies in the range, quality and variety of tourist accommodation and other related facilities.
- A lack of particular leisure and recreational facilities in certain areas.
- Areas of high scenic quality and nature conservation interest containing little tourism related infrastructure.
- Large tracts of open countryside, especially attractive to hill walkers, cyclists and anglers.

4.3 highlights amongst other things a lack of particular leisure and recreational facilities. Two projects at the advanced planning stage will do much to remedy this. The Outdoor Curling Centre will be unique in Britain and is forecast to attract upwards of 10,000 visitors a year from Scotland and abroad. It will also be a major recreational and sporting resource for the local community. The Environmental and Outdoor Activity Centre will also fulfil these roles. Neither will be able to proceed if wind farms are developed, as visitors are attracted by unspoilt scenery as well as by the projects themselves.

4.8 In order to facilitate the expansion and diversification of the East Ayrshire economy and to maximise the economic potential of the area for substantial tourism development, the Plan:

- Promotes the Doon and Irvine Valleys as tourism gateways to East Ayrshire and, in particular, encourages tourism related developments relating to the industrial heritage of both areas.
- Promotes and encourages tourism related developments pertaining to the high scenic and landscape quality of the area, and particularly in:

- The Loch Doon area, comprising one of the last areas of wilderness in the south of Scotland.
 - Glen Afton
- Promotes and encourages natural heritage based green tourism in areas of high nature conservation interest particularly:
 - The Muirkirk Uplands, recommended by Scottish Natural Heritage as a candidate Special Protection Area to meet the Government's European requirements.
 - The River Nith area which is of significant ornithological interest.
 - Promotes strategic cycle route and footpath links with the national cycle and footpath networks.

Under 4.8, the Local Plan promotes the Doon Valley as one of two tourism gateways to East Ayrshire and 'promotes and encourages tourism related developments relating to the high scenic and landscape quality of the area and particularly in the Loch Doon area, comprising one of the last areas of wilderness in the South of Scotland'.

Wind farms would severely damage the landscape. They would be visually intrusive and would dominate and affect the views from the A713 'Tourist Route' from every approach. They would be visible from and detract from the very wildness that makes the country around Loch Doon an area of such visitor potential.

Dalmellington and the Upper Doon Valley contain 7 of the 9 Areas of Tourist Potential tabled under 4.9. The potential is clear and strong. To tap it requires enhancement of the natural heritage and landscape. Wind farms would largely destroy it, for no benefit to the community.

Policy M4 relates to Minerals, but the principles behind (ii) and (iv) are relevant to the proposed wind farms.

M4 (ii) States that "the impact of the development on the natural and built heritage, including wildlife and other sites of nature conservation interest, historic gardens and designed landscapes, the visual amenity and the landscape character of the area".

M4 (iv) states that "any cumulative impact of the development either concurrently or successively in association with other similar developments in the vicinity of the site;"

The existing wind farm at Windy Standard (plus the proposed extension) and Ardrossan are already extremely visible from nearly all parts of the higher ground here. The cumulative impact of wind farms in the Upper Doon Valley would damage the beauty of these uplands and make inward tourism most unlikely.

Housing

Composition of the housing Land Supply.

6.16 The Local Plan has identified a range of sites to meet the needs of both the public and private sectors and the requirements of both the larger scale volume builder and the smaller developer. The Housing Land Supply includes sites suitable for the following types of development.

- (i) General Needs Housing; The Local Plan identifies sites throughout the area settlements for general needs purposes. These sites have been selected where they can:
 - Be fully integrated into existing settlement infrastructure.
 - Contribute positively to the overall visual amenity of the area.
 - Fully respect the landscape and environmental quality of their surroundings.
 - Best support or minimise strain on existing community facilities and other services.
- (ii) Special Needs Housing: Although much of the demand for Special Need Housing can be met through the conversion of existing property, a number of housing sites located close to shopping facilities and other local services are specifically safeguarded for new build special needs housing provision by both the Council, in partnership with Scottish Homes and registered social landlords and by private housing developers. The design of new general needs housing to barrier free standards to be capable of conversion to meet special needs, would also assist in meeting demand for this type of development.
- (iii) Affordable Housing. Under the auspices of the East Ayrshire New Housing Partnership, a number of sites will be developed as a first phase

of a programme of housing for rent and low cost housing for sale. These sites are specifically identified for such purposes in the Local Plan.

- (iv) High Amenity Housing. The availability of housing in the upper market range is seen as important for both inward investment purposes and for the retention of professional managers and executives in the area. The Plan specifically identifies and safeguards sites for high amenity housing and also recognises that the conversion of existing large listed buildings, together with any associated enabling development, may also make a contribution to the supply of such housing.

6.16 recognises the need for High Amenity Housing. Experience elsewhere in the country shows that wind farm developments have a negative impact on property values. Developers will therefore be wary about creating houses of high amenity and good architectural quality in such areas.

A sustainable regeneration based on tourism will bring jobs, prosperity and renewed pride in the community. This will lead to increased care and conservation of existing buildings and the creation of new homes of higher architectural and construction quality. As stated earlier, wind farms would preclude this regeneration.

Community and Service Infrastructure

8.2 NPPG Requirements

- To provide positively for renewable energy developments where this can be achieved in an environmentally acceptable manner.
- To establish an adequate network of treatment and disposal installations to handle waste arisings as close as possible to the point of production.

8.2 sets out an NPPG Requirement . IN the landscape of hills, lochs and forests within which Dalmellington lies, wind farms would dominate the settlements and major potential tourist areas of Dalmellington and the Upper Doon Valley. They would be visually intrusive, they would dominate the landscape and prevent sustainable development based on tourism.

This area already contributes renewable energy through the Loch Doon hydro scheme and there is also great potential for energy crops such as short rotation including willow coppice, on ground restored following opencast coal extraction. These forms of renewable energy do not impact on the natural environment or the landscape. The area can therefore continue to play its part in contributing renewable energy without destroying its future.

8.5 states that “While supportive of renewable energy projects, it is considered imperative that the more sensitive parts of the rural area in terms of landscape quality, nature conservation and heritage interest are adequately protected. The potential impact of wind farm development on the environment and visual amenity of the area is of particular concern to the Council.”

This beautiful and sensitive area should be protected from wind turbines. The first green shoots of regeneration here are fragile and the future of Dalmellington is in the balance. Given support and encouragement the spirit of the community and the natural assets of our landscape will lead to an exciting and sustainable future based primarily on tourism. Wind farms would destroy this prospect and the present hopes of recovery from the wounds of the past would be dashed.

Policy CS8 states that “The Council will be supportive of Renewable Energy developments within the Local Plan area.”

The Upper Doon Valley has contributed renewable energy from the hydro scheme at Loch Doon for over 70 years and there is potential for energy crops such as short rotation willow coppice, including on areas restored following opencast operations.

Policy CS8 (ii) states that “In existing or proposed Sites of Special Scientific Interest (SSSI's) and Environmentally Sensitive Areas (ESA's), where it can be clearly demonstrated that:

- Any underlying objective and overall integrity of the designed area will remain largely unaffected; or
- Any adverse effects on the environmental qualities for which the site has been designated are outweighed significantly by the national benefits that could accrue from the development.

Much of the countryside around Dalmellington forms part of the Western Uplands ESA. The overall integrity of this designated area would be fatally compromised by wind farms. The national benefits of renewable energy schemes can and are being met by non-wind power means. There are other sites in Ayrshire already producing wind power and within the country as a whole there are sufficient sites capable between them of meeting the Government's targets without the tragic effects that these developments would have on this community.

Policy CS9 states that “ All wind farm, wind turbine and other renewable energy developments will be rigorously assessed against the following criteria:

- (i) The extent to which the development may adversely affect any sites of nature conservation interest and, in particular, the natural habitat, territory and breeding areas of upland birds;
- (ii) The extent to which the amenity of residents of nearby towns, villages and other residential properties may be adversely affected by reason of noise emission, visual dominance and other nuisance;

Wind farms would visually dominate the settlements and landscape of Dalmellington and the Upper Doon Valley. They would most seriously detract from the amenity of residents and would prevent the regeneration of the community which is otherwise promised.

- (iii) The extent to which the development may adversely affect any recognised heritage resources, including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Archaeological Sites and Historic Gardens and Designed Landscape and their individual settings;

Wind farms would adversely affect:

- a) The setting of many Listed Buildings, including the Grade A Dunaskin Heritage Centre and Craigenkillan, two of the focal points for the sustainable regeneration of the community.
- b) The Conservation Area of Dalmellington.
- c) Scheduled Ancient Monuments including Dalnean Hill.

- d) Nearly 100 Archaeological Sites.
- e) The Designed landscape of Craigengillan.

(iv) The visual impact of the proposal and its setting within the immediate and wider natural landscape:

Wind farms in the Dalmellington area would have a damaging and major visual impact on the Sensitive Landscape Area, designated as a Safeguarded Area in the Local Plan.

(v) The extent to which the proposal may conflict with the Council's strategy to promote tourism related developments in the Doon and Irvine Valleys, Glen Afton and the Muirkirk Uplands;

Wind farm developments would be in direct conflict with the Council's Strategy to promote tourism related developments in the Doon Valley; they would prevent them from happening.

(vii) The cumulative impact of the proposal with other existing or authorised renewable energy developments within the vicinity of the development site;

The existing wind farm developments at Windy Standard and Ardrossan are clearly visible from much of the Upper Doon Valley.

Environment

There are many sections under this heading of the Local Plan which are relevant:

Prime Objective

- 10.1 The council is committed to protecting, conserving and enhancing the character, appearance and amenity of the natural and built environment of East Ayrshire for future generations. The key elements to be addressed in this regard are:

- Built heritage
- Townscape and design
- Natural heritage
- Landscape and the rural environment
- Environmental protection

Policy Context

10.2 The Environment Section is set within the context of NPPG5: Archaeology & Planning; NPPG14: Natural Heritage; NPPG18: Planning and the Historic Environment; and NPPG7: Planning & Flooding. Pan33: Development of Contaminated Land and PAN51: Planning and Environmental Protection have also been used as a basis for formulating the Council's approach to environmental protection issues. The Plan also meets the requirements of the Ayrshire Joint Structure Plan in terms of environmental protection, conservation and enhancement.

NPPG Requirements.

- To encourage the preservation of sites and landscapes of archaeological and historic interest.

The settings of the Scheduled Site at Dalnean Hill and the Craigen Gillan Designed Landscape would be greatly damaged by wind farms within the Dalmellington area.

- To safeguard historic properties and the historic environment from inappropriate development.

The settings of the Grade A Listed Dunaskin Heritage Centre and Craigen Gillan would be severely affected by wind turbine developments.

- To promote the continued use of historic property and environments.

Craigengillan and its Designed Landscape are a source of pride and benefit to the local community and are the focus for three major tourism related projects which between them will create 20 full time jobs and attract over 20,000 visitors each year to the Upper Doon Valley. These projects would disappear if the wind farm proposals were approved.

- To protect and enhance the landscape quality and natural heritage interests of the area.

Wind farms would seriously damage the landscape quality and natural heritage interests of the area.

- To guide, regulate and control development in areas at risk of flooding.

Relevant Structure Plan Requirements are:

- To conserve and enhance local landscape character.
- To define Sensitive Landscape Areas and policies for their protection and enhancement.

Wind farms within the Dalmellington area lie within and adjacent to Sensitive Landscape Areas, which are Safeguarded Areas. Whereas they would be adjacent, their structures are so visually dominant as to affect them as much as if they were sited within them.

- To interpret and promote the archaeological locations at Muirkirk and the Upper Doon Valley.

The Settings of these locations, an important factor in the development of 'green' tourism in the area, would be gravely compromised by wind turbine developments.

- 10.3 A High quality physical environment is an important factor in attracting investment and the Council is committed to protecting those elements of the natural and built environment which contribute positively to the intrinsic quality and character of the area.
- 10.4 affirms that “A High quality physical environment is an important factor in attracting investment and the Council is committed to protecting those elements of the natural and built environment which contribute positively to the intrinsic quality and character of the area.”

The hills of the Upper Doon Valley are a major part of its natural character. The SSSI at Ben Beoch is notified for its geological interest, but is also a strong landscape feature; a rare rock formation similar to Fingal’s Cave on Staffa.

The great Scottish Judge, educationalist and philosopher visited Dalmellington in 1844. He wrote “When the time shall come (as come it will) when Southern cottages or southern neatness shall be introduced into Scotland, what a village Dalmellington may be. A few old trees, irregular ground, tumbling burns, a spire, and a mill – what more is wanted? Three years later, Cockburn grieved for progress: It has the appearance, and the reputation of being a singularly virtuous and happy village; and I am told is perhaps the last place in Ayrshire where, with a good deal of old primitive manufacture, rural simplicity and contentment still linger. But it is now to taste of manufactures in an improved state. The devil has disclosed his iron, and speculation has begun to work it. There seemed to be about a dozen of pits sinking within half a mile of the village, and before another year is out those now solitary and peaceful hills will be blazing with furnaces, and blighted by the presence and the vices of a new population of black scoundrels. They were many indignant knolls.

Ironworks and coalmines have come and gone. The little town remains depressed and neglected, and the peaceful and solitary hills are being carted away in the search for opencast coal.”

The last paragraph was written in 1992 by Rob Close in ‘Ayrshire and Arran’ – RIAS. Since then the hope of regeneration has developed and several exciting projects are underway. Wind turbine developments would extinguish this hope and finish these projects in their tracks.

10.5 Those elements that contribute to the built heritage of East Ayrshire comprise:

- Conservation Areas
- Listed Buildings
- Ancient Monuments and Archaeological Sites
- Historic Gardens and Designed Landscapes.

The Settings of the Conservation Area of Dalmellington, the many Listed buildings, the Ancient Monuments and Archaeological Sites and the Designed Landscape of Craiggengillan, all so important to the sustainable development of the Upper Doon Valley for tourism, would be greatly damaged by visually dominating wind turbines.

10.17 The Local Plan recognises the importance that areas of natural heritage can play in the economic regeneration of the area, particularly through the development of green tourism as described in the Tourism, Leisure and Recreation section of the Plan.

Natural Heritage Designations

Special Protection Area	1
Special Area for Conservation	2
SSSI's	19
Provisional Wildlife Sites	111
Local Nature Reserves	2

Five of the nineteen SSSI's in East Ayrshire (26%) lie within very close proximity to Dalmellington, together with one of the region's two Local Nature Reserves and a huge swathe of country designated as a Provisional Wildlife Site.

Green tourism and a landscape dominated by semi-industrial development do not coincide.

Landscape and the Rural Environment

10.19 East Ayrshire contains a wide diversity of landscapes comprising:

- Areas of extensive heather uplands
- Large coniferous forestry plantations
- Attractive river valleys
- Estate lands and designed landscapes with associated mixed and broadleaved woods.
- Agricultural land with traditional field patterns, mature hedgerows and shelter belts, hedgerow trees and scattered woods.

Maintenance of the character and qualities of each particular landscape type within East Ayrshire has been a prime consideration in the formulation of all Local Plan Policies relating to the development and use of land.

Dalmellington and the Upper Doon Valley contains a rich variety of landscape within a comparatively small area. This is a major draw for tourism and creates an environment of high amenity for those who live and work here. It is a fragile and sensitive landscape however. It has just survived the effects of its industrial past, but would not survive further intrusion and dominance.

10.20 Although parts of East Ayrshire are considered to be of high landscape value, there are no statutory landscape designations within the area. A Landscape Character Assessment for Ayrshire has been produced and adopted by the Council, which identifies a total of 13 distinct landscape types in East Ayrshire. This Assessment has been instrumental in the identification of Sensitive Landscape Character Areas in the Local Plan within which priority is given to the protection and enhancement of the landscape particularly with regard to its overall scenic quality, the unspoilt nature and heritage interest of the area and its contribution towards a definite sense of place. The Sensitive Landscape Character Areas indicated on the key diagram on the approved Ayrshire Joint Structure Plan. The Local Plan defines these areas more precisely on the ground, using natural and other topographical features such as roads, field boundaries, streams etc. to delineate precise boundaries for the areas concerned. The Sensitive Landscape Character Areas are indicated on the Local Plan maps.

Wind farms within the Dalmellington area would either fall within the Sensitive Landscape Area or be so close to it that, bearing in mind the sheer scale of the turbines, equivalent to 50 storey office blocks, they would completely dominate it.

10.21 There is a considerable legacy of dereliction in the rural parts of East Ayrshire with untreated bings associated with past mining activity and derelict buildings and land associated with other industrial operations having a detrimental impact on the rural environment. Rehabilitation of these sites is urgently required although it is recognised that some bing areas have regenerated naturally and may be of some nature conservation interest.

10.22 The Plan also seeks to protect the landscape as an important element in the economic regeneration and diversification of the area, particularly for leisure, recreational and tourism purposes.

Far from rehabilitation, dominating wind turbine developments would reinforce the past abuse of the landscape. They would prevent the planned economic regeneration of the Upper Doon Valley.

Environmental Development Strategy

10.28 East Ayrshire Council is committed to protecting, conserving and enhancing the character, appearance and amenity of East Ayrshire, especially as regards its landscape quality, the built and natural environment and areas of natural heritage and built heritage importance. This will be achieved by:

- Targeting the main strategic access and tourist routes for environmental treatment and improvement.
- Working in collaboration with local communities to prepare and implement appropriate Environmental Improvement Action Plans for those areas suffering especially from problems of poverty, decline and social exclusion.

The Upper Doon Valley is defined in the Plan as a strategic access and tourist route. Wind turbines would therefore be in direct conflict with the Environmental Development Strategy.

Built Heritage Policies

Policy ENV1

The Council will seek to protect, preserve and enhance all heritage resources requiring conservation including Listed Buildings and Conservation Areas, together with their respective settings, Scheduled Ancient Monuments and Archaeological and Industrial Archaeological Sites and Landscapes.

Policy ENV4

The Council will seek to ensure that all development within or affecting the setting of a Conservation Area or affecting the appearance or setting of a Listed Building, is sympathetic to the area or building concerned in terms of its layout, size, scale, design, siting, materials and colour of finish. Wherever possible, all proposals should seek to preserve, enhance or incorporate features, which contribute positively to the character or appearance of the area and have due regard to the architectural and historic qualities of the area or building concerned.

Reason for Policy ENV4

- To ensure that the new development is sympathetic to the character of existing buildings and areas of architectural and historic interest.

The large scale, dominating and visually intrusive nature of wind turbine developments would have a marked and adverse effect on the settings of Listed Buildings, many of them Grade A, Conservation Areas, Scheduled Ancient Monuments including Dalnean Hill, over 100 Archaeological Sites including the

Dunaskin Heritage Centre and landscapes including the Designed Landscape of Craigenkillan.

Policy ENV6

The Council will actively encourage and support the improvement and enhancement of the natural and built environment in accordance with the Local Plan Environmental Development Strategy.

Reason for Policy ENV6

- To direct environmental improvements to those areas most in need.

This policy recognises the importance of improving and enhancing the environment in facilitating economic regeneration through tourism and inward investment.

Wind turbine developments, far from improving or enhancing the landscape, would dominate it and reinforce the scars of the industrial past and the rape of the landscape. Dalmellington is a SIP Area with high unemployment. Sustainable economic regeneration through tourism and inward investment is what it needs.

Wind farms here would be developments are contrary to the Policy ENV6.

Landscape and Rural Environment Policies

Policy ENV11

Within the Sensitive Landscape Character Areas identified on the Local Plan maps, the council will give priority and prime consideration to the protection and enhancement of the landscape in consideration or rural development proposals. The Council will not be supportive of development which would create unacceptable visual intrusion or irreparable damage within these arrears and will be supportive of development proposals only where these positively enhance or protect the natural landscape, wildlife and cultural heritage of the area or promote the social and economic well-being of communities.

Policy ENV12

Throughout the rural area, and especially in the Sensitive Landscape Character Areas identified on the Local Plan maps, the Council will ensure that all development proposals respect, in terms of their design, the local landscape characteristics of the particular area within which they are proposed. Developers will be expected to conserve and enhance, and reinstate or replace where appropriate, those features which contribute to the intrinsic landscape value and quality of the area concerned, including:

- (i) Existing setting of settlements and buildings within the landscape.
- (vi) Existing skylines, landform and contours.

Wind turbine developments would be almost certain to dominate the skyline and would damage very severely the settings of Dalmellington, Burnton, Waterside and Patna.

Monitoring, Evaluation and Review.

11.1 It is essential that the range of policies, proposals and recommendations identified in the Local Plan are fully implemented in order:

- To achieve the regeneration of East Ayrshire
- To enhance the amenity and environment of the area; and
- To improve the quality of life of local residents.

As described above, wind turbine developments are contrary to the Local Plan. They would:

- Prevent the regeneration of the Upper Doon Valley.
- Dominate and severely damage the amenity and environment of the area.
- Through immediate loss of jobs, loss of the prospect of sustainable economic generation and through the scarring of the landscape, the quality of life of

local residents would be made greatly worse and the hopes for the future would be dashed. The community would enter a downward spiral of decline.

General grounds for objection.

Over the last 190 years Dalmellington and the Upper Doon Valley have paid a high price in helping to produce and carry the nations energy requirements. The ironworks, the deep coalmines and more recently opencast extraction and the electricity interconnector pylon line have made heavy scars on the landscape. The effect of these scars is to reduce the amenity of the area as a place to live, work and enjoy. This made it harder to attract the new investment which was so greatly needed following the closure of the deep mines, with the result that unemployment has been very high.

Appendix 2

Reasons why Dalmellington should be protected from wind turbines.

Wind turbines, together with pylon lines needed to transport the electricity, are massive in scale and would dominate the landscape of Dalmellington, one of the oldest settlements of the Upper Doon Valley.

The area already contributes to renewable energy

- Existing and approved wind farms can already produce power equivalent to more than 100% of the area's consumption.
- Loch Doon has been producing energy through its hydro scheme for over 70 years.
- There is considerable potential, as identified in the Local Plan, for energy crops such as short rotation coppice willow on ground including restored opencast workings. This form of renewable energy does not mar the landscape or prevent sustainable economic regeneration; indeed it would actually provide jobs.

The natural landscape around Dalmellington is one of rolling hills, woods, lochs and rivers. Around 2000 acres are recognised as a Designed landscape by Historic Scotland, one of only 4 such sites in East Ayrshire. Gentle hills rise from the expanse of a 60 acre fresh water loch, the meadows and hill pastures bounded by ancient stone dykes and some 15 miles of newly planted hedgerows. There are magnificent stands of beeches, Oaks, silver birch and Scots Pine. Through this tranquil landscape flows the River Doon. An historic path through the river gorge, itself a site of special scientific interest has just been restored and is one example of the many partnership initiatives aimed at regenerating the environment and local economy. The turbines would be brutally intrusive and detract from its wild beauty. They would destroy the landscape.

Adjacent to the proposed site, the derelict pit buildings and bings of the deep mines were removed during the opencast operations and as the opencast has moved northwards the ground has been restored. It is now approaching its pre-industrial form.

The scars of the past are therefore healing and it would be a tragedy if they were to be reopened by this intrusive proposal.

We have a beautiful landscape, scarred in part by past iron and coal workings, but now being restored. After 200 years, we wish to be left in peace and to regenerate the local economy and environment.

Dalmellington has a great and very distinct character, tremendous spirit, strong pride in the community and a passionate love of the surrounding countryside.

In the past two or three years a sense of hope in the future has been born and with the backing of the Council and local groups many initiatives have been taken to regenerate the life of the village and to restore and enhance the built and natural heritage. Some of these initiatives have created employment directly while others have done so indirectly, by attracting visitors and new investment as a result of making the place more beautiful.

Dalmellington is strategically located on the A713 tourism gateway route, surrounded by some of the most beautiful country and with a fascinating history and heritage.

Tourism is seen as having the greatest single potential for regeneration, as confirmed in the Local Plan.

Tourism is a sound and sustainable source of regeneration. As more visitors come, more jobs are provided and the incentive grows for ever greater enhancement of the built and natural heritage. As this happens inward investment grows, self confidence returns and the whole community becomes stronger.

The likely scale of any wind farm development here would completely dominate Dalmellington and the Upper Doon Valley. They would reinforce its old image of an industrial 'dumping ground' and would hit on the head all efforts to bring about regeneration.

Wind farms would produce no long term jobs, as conceded by Amec the would be developer of a current proposal for this area. If allowed to proceed, wind farms would destroy all potential for tourism. Not only would they cost the chance of future new employment, they would lead to the direct loss of at least 30 full time jobs in an area with one of the highest rates of unemployment in the country.

Wind farm developments are contrary to the central principles and nearly every detail policy of the recently adopted Local Plan, as summarised later.

The community of Dalmellington and the Upper Doon Valley have paid a high price in helping to produce and carry the nations energy requirements.

Through the creation of the hydro – scheme at Loch Doon, the area has contributed to renewable energy for 70 years. There is potential for a further contribution through the growing of biomass / short rotation willow crops.

It has suffered, but remains one of the most beautiful parts of East Ayrshire. It has the potential not only to regenerate but to act as the seed / inspiration for regeneration for other parts of the former Ayrshire Coalfield.

Regeneration is already underway. It would be a tragedy if it were to be destroyed in its infancy, which is what would happen if wind farms were to be permitted here.

Wind turbines would dominate the village and its approaches and would take away the beauty and sense of natural wildness that characterises the surrounding landscape of hills, woodlands, rivers and the great tract of the remarkably secret and unexploited country around Loch Doon and its hinterland.

As mentioned earlier nearly 2000 acres adjoining Dalmellington has been recognised by Historic Scotland as a Designed Landscape. Active conservation of this land has proved what can be done in the Upper Doon Valley as a whole. A Grade A Georgian Stables has been restored and developed as a livery stables and trekking centre, producing two new full time jobs. An outdoor curling centre and environmental centre are due to open within the next 12 months, producing a minimum of 18 new jobs and attracting 15,000 – 20,000 visitors a year. These enterprises depend to a large extent on the natural beauty of their surroundings. They will not succeed if the landscape is blighted.

The area already provides a high proportion of wind power. There are existing or approved schemes at Hadyard Hill, Harehill, Windy Standard and Ardrossan, with plans for others at Spirelack, Muirkirk and a doubling of the current development at Windy Standard. They have a major impact on the character of the landscape and can be seen from tens of miles away. Turbines at Dalmellington would be worse in that they would dominate the settlement, the oldest in the Doon Valley.

Considering its hard past and the high level of unemployment, the spirit and talent of the place is amazing. It was recognised by the remarkable achievement of Doon Academy being selected from the whole of Scotland as its BBC Scotland Sound Town.

Loss of jobs and opportunities as a result of wind farms would consign another generation to unemployment and lead to the slow death of the community as bright

and enterprising school leavers move away to seek opportunities in other parts of Britain.

Dalmellington has a new found confidence in its future, based on a regeneration that will be founded on tourism.

We believe that wind turbine developments here are environmentally unacceptable:

- Turbines are up to 120 metres high. This is equivalent to 50 storey office blocks. They would dominate the landscape of Dalmellington and the Upper Doon Valley and prevent the sustainable economic development of the area, which is recognised within the Local Plan as being founded on tourism.
- It is not just the scale of the turbines but the fact that their blades are of course in motion. This multiplies their visual effect in the same way as a person waving their arms.
- It is not mentioned that the turbines may need to be lit at night, as many structures more than 300 feet tall must have aircraft warning lights. This could mean that even at night the wind farm would be dominantly visible.

The first green shoots of environmental and economic regeneration and hopes for the future will be destroyed by the wind turbine development with its brutal visual intrusion, the loud, low – frequency noise it would create and the stroboscopic effects of the rotating blades by day and possibly also by night.

Ecological Effects

The central core of this representation on the protection of Dalmellington from turbines is their visual dominance and the fact that they would destroy all chance of sustainable economic and environmental regeneration in the Upper Doon Valley. This of course has major knock on effects on wildlife. Regeneration based on tourists attracted to a beautiful landscape and high natural history interest will result in ever greater care of our natural assets.

Effects on Archaeology

While the turbines would not of course be built on archaeological sites, they would dominate their settings and destroy the atmosphere of ancient beauty. There is a particularly rich archaeological heritage in the Upper Doon Valley, including the Scheduled Monuments of Benquhat Village and Dalnean Hill.

Archaeological interest is a strong asset in a tourism based regeneration and the setting of these ancient remains is as important as the sites themselves.

The scars of the past are being healed, there have been tremendous environmental initiatives by people within the valley in recent years and there is a growing feeling of hope for the future. These hopes would be dashed if wind turbine developments were to be permitted here. The chances of a sustainable economic and environmental regeneration would be destroyed.

Renewable energy has its place but the current proposal would do infinitely more harm than good. It would bring no jobs. It would result in the immediate loss of 30 or more jobs and untold future ones. It would consign Dalmellington and the Upper Doon Valley to a slow death just at the time when there is a promise of a brighter future.

We are, as stated earlier, fully in favour of all renewable energy projects which are compatible with the life and development of this community, including energy biomass and hydro-electricity.