

**From:** Lyndsey [REDACTED]  
**Sent:** 26 January 2015 14:15  
**To:** devplans  
**Subject:** CONSULTATION RESPONSE RE PLANNING FOR ONSHORE WIND ENERGY

**Importance:** High

Please find below my response to the consultation on planning for onshore wind energy. This has been submitted after the deadline due lack of notification and on the understanding that its acceptance into the process has been agreed by Highland Council. Please inform me if that is not the situation.

Introduction:

The current wind farm policy is wholly inadequate and does not give protection to the landscape, wildlife, essential peatlands and perhaps most importantly people who live in targeted areas. The situation appears to be out of control with no known targets for required turbine numbers by the Scottish government and, with no central data base, knowledge of turbine numbers in the planning system at any one time across Scotland as confirmed in a meeting with the Energy Minister in December 2013. There appears to be no end in sight to turbine applications and people are losing heart and confidence in a planning system that appears to favour the multinational developer over them. With some communities spending years of their time and thousands of pounds of their own money trying to protect what those in positions of power should be doing it is time for a fairer and more appropriate planning policy to deal with wind turbine applications.

*1) What do you consider to be the minimum scale of onshore wind development that our spatial framework should apply to?*

Such is the extent of proposed onshore wind development in many Highland regions all wind turbine applications, regardless of turbine size and numbers, should be considered under the spatial framework.

In addition all met mast applications that are undeniably intended as precursors to wind farms should be considered under the same framework and include visualisations as to what is more than likely to follow - a wind farm application followed by a grid connection application.

To simply ignore the wind farm connection is not acceptable and **will be** continually challenged by objectors.

Grid connection should also be considered alongside wind turbine applications as the pylons, transmission lines and substations can have an adverse impact on the wider landscape and should not be put in a box to be 'dealt with later'. Grid connection is, without doubt, a huge part of a wind farm's impact on the landscape. It is **impossible** to separate them.

*2) Apart from the matters identified in Table 1 of SPP, what other considerations do you think we should take into account when identifying where there is strate-gic capacity for wind farms and areas with the greatest potential for wind devel-opment? And what information is available to help us consider those issues?*

The true cumulative impact cannot be completely assessed while developments are taking four years to be



constructed from approval. (eg Dunmaglass wind farm). Therefore, it is increasingly difficult to identify where there is any capacity remaining for further development. Grid connection, access roads and large substations add to that impact. It should not just be a question of identifying the wind farms that are proposed in an area but all associated infra structure should also be considered as part of cumulative impact.

**Ideally no further wind applications should be considered until those approved are constructed and Highland Council should make a stand against more applications being accepted into an already over-burdened planning system.**

**The Scottish government must be made aware of the monumental problems planning committees are facing with seemingly never ending turbine applications being submitted when visual impact cannot be properly addressed by looking at visualisations instead of constructed developments.**

Past planning decisions have shown that the visual impact on paper can bear little or no relationship to the actual impact when the wind farms are built.

Fallago Rig is a case in point where the turbines **do not** fit into the 'bowl' of the landscape as was suggested and approved on.

In addition the absence of up dated wind farm maps from SNH and the SG makes it even harder to assess what is happening in any given area. Unfortunately any up dated maps soon become 'out of date' due to the scale of wind farm applications being presented to local authorities.

It has recently been reported that 527 turbines are proposed in just over a 20 mile radius from a wind farm proposed near Loch Ness. Unesco is voicing concern regarding the Jurassic Coast wind farm and the possibility of the area losing its World Heritage status and that should surely ring alarm bells here for Loch Ness and its bid for WHS.

It was reported in the Independent today:

*'Unesco has also criticised the proposals, telling the Government in a letter that the development, known as Navitus Bay, would "adversely impact" the view and raising the prospect that its World Heritage status could be removed.'*

<http://www.independent.co.uk/environment/jurassic-coast-windfarm-plan-at-unesco-site-like-bulldozing-buckingham-palace-residents-warn-9999513.html>

If planning application fees were fairer ( a £22,000 fee in Scotland is reported to cost £250,000 in England) there would be more resources to deal with applications, appeals and public inquiries. NB THC budget £50,000 pa for all appeals and PLIs. One wind farm PLI cost THC £67,000. Where does the shortfall come from?

Increasingly wind farm developers do not abide by local decisions and now routinely appeal to the Scottish government.

An increase in fees would go some way in reducing the numbers of speculative turbine proposals being submitted.



There is simply no control over turbine applications coming into a local authority that is already implementing cuts across its services.

**Without proper updated maps it is impossible to make a fair and sound judgment on further applications in areas that have been heavily targeted by developers.**

Also there should be a regulatory (ie NOT guidance) 2km minimum distance from any residential property or school or any other public building or amenity for turbine construction of any size.

Where wind farms have been refused in a particular area any subsequent applications in the same area should be prohibited for at least three years. The same communities are continually being targeted by wind developers. It is unfair and deeply distressing for local residents who have successfully objected to one development only to be put in the same position again and again. Some communities have been subjected to many applications with no respite.

***3) What criteria do you think we should consider in deciding all applications for wind farms of different scales, including extensions and re-powering? And what information is available to help us set those criteria?***

Can the landscape absorb any more turbines and do the communities who will have to live with approved wind farms support such development?

***4) Do you think that defining clusters of wind energy developments and important gaps between them is useful to help guide where further development may be most appropriate?***

Where gaps are deliberately left between wind farms it is impossible to see that it can ever be appropriate to 'fill in' these gaps with further development and wind farm extensions. Communities are finding it increasingly frustrating to see these gaps filled in with yet more turbines when they expected them to be protected from further development.

***5) Given that national policy does not allow us to include the results of the Cumulative Landscape and Visual Assessment of Wind Energy in Caithness (the CLVA) in the spatial framework, in what ways do you think we should take it into account in our plans and guidance?***

It is impossible to have a robust and fair planning policy that does not take on board local groups and individuals opinions on the findings of the CVLA

***6) If you have any general comments about the CLVA, please give them here:***

See answer to 5)

Lyndsey Ward





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