

Kellie Kotze

From: PAT WELLS [REDACTED]
Sent: 26 January 2015 03:02
To: devplans
Subject: Planning for onshore wind energy
Attachments: SHWC - CONSULTATION RESPONSE TO THE PLANNING FOR ONSHORE WIND ENERGY JAN. 2015.docx

FAO: David Cowie

Dear Mr Cowie

Thank you for permitting an extension to the Spatial Framework initial consultation.

Please see attached the response on behalf of Stop Highland Windfarms Campaign. We are very concerned that government policy will stifle any attempt by planners to put in place a framework which will allow the longer-term interests of the Highland landscape, wildlife and people to be met.

We would appreciate the opportunity to comment on the main draft when it is out for consultation.

Please get in touch if clarification is needed of any points raised in our initial response.

Yours sincerely

Pat Wells Convener SHWC
[REDACTED]

STOP HIGHLAND WINDFARMS CAMPAIGN

Please reply to: Mrs Pat Wells, [REDACTED]

[REDACTED]

THE HIGHLAND COUNCIL: PLANNING FOR ONSHORE WIND ENERGY CONSULTATION RESPONSE

Introduction Stop Highland Windfarms Campaign (SHWC) is an established umbrella organisation for local groups and individuals opposed to wind farm developments in the Highlands.

Comment The Highland landscape is systematically becoming a “wind farm landscape” with some of the most iconic and cherished views now so industrialised and degraded that visitors are saying they will not return and they will not encourage others to visit. This is evidenced by the petition which originated in the USA in 2013. The front cover reads *“We the people from all over the world who love Scotland, petition First Minister Alex Salmond and Energy Minister Fergus Ewing to stop the reckless siting of wind turbines in Scotland.”*

The latest version of Scottish Planning Policy (SPP) clearly indicates the plea fell on deaf ears. However, the 4,500 signatories from 48 countries around the world have not forgotten what they signed up to and the telling comments they wrote. In addition several recent surveys have indicated that people will choose to holiday in other locations as the number and size of wind farms increase relentlessly across Scotland’s (once) world-renowned landscape.

The original version of the Council’s ‘Supplementary Guidance: Onshore Wind Energy’ gave a margin of hope that at least some areas would be spared the environmental vandalism of wind farm development. However, the political goal posts have moved several times since its publication and Scottish Government policy on wind energy has become increasingly prescriptive and increasingly destructive economically, environmentally and socially.

Highland Council is one of numerous councils faced with modifying its spatial framework to comply with SPP (June 2014). Before addressing the specifics of your consultation questions we wish to ask Highland Council to join with other councils and make a stand against the political machine which is rapidly destroying one of Scotland’s most important assets – its natural environment. There is an urgent need for planners to show strong leadership here rather than meekly acquiesce to a ruinous government diktat. /

Responses to the specific consultation questions

Q1 The spatial framework should apply to ALL scales of onshore wind energy, including single turbines. Even one, let alone the cumulative impact of numerous individual turbines in the landscape have an adverse visual impact. This is exacerbated by different turbine heights, design, colour, movement etc. The demand for approval of single or small numbers of turbines may well increase in future. Careful consideration needs to be given with regard to the possible areas of search for such developments as they are often located much closer to residences and public spaces. Noise, flicker, ice-throw and effects on health from low frequency sound and infrasound are just some of the potential problems.

Q2 Regrettably the matters identified in Table 1 of SPP are simply rhetoric and empty of any genuine protection for the natural environment. Small parcels of land designated as worthy of "significant protection" serve only to tick boxes for politicians. They bear no resemblance to how nature works in reality, with the need for migration corridors, flight paths, hunting and feeding areas, territorial boundaries etc. If Group 2 areas become surrounded by Group 3 areas strewn with industrial machinery, damaged soils and vegetation and polluted watercourses, the natural heritage of both areas will be irreparably damaged.

A much more holistic approach is needed and Highland has very few sites which could accommodate all the adverse impacts of a wind farm. Reference is made in SPP to wild land and peat soils but both are prefixed with the word "mapped." This diminishes any real protection for the land in its entirety because the mapping has to fit with Scottish Government policy in support of proliferation of wind energy developments (Stronelaig wind farm saga provides a typical example).

Admittedly some peat soils have been partially degraded due to poor management but they still provide an important carbon sink. The spatial framework should **EXCLUDE DEVELOPMENT ON ALL PEAT SOILS** whether or not they are "mapped."

Dr Richard Lindsay provides the most telling information: *"If we are worried about carbon emissions we shouldn't be worrying about the rainforests, we should be worrying about our peatlands."* However, in reality the construction of wind farms has little to do with reduction of carbon emissions, despite the rhetoric of developers and politicians – it is about milking the subsidy currently available at the expense of industrial and domestic electricity users.

Q3 Cumulative and sequential visual impact must be considered together with the capacity of the landscape for industrialisation. These are all subjective criteria and the developer will always claim to have "designed the wind farm to minimise the visual impact....." If planners and decision-makers choose to believe this spin it is pointless setting any criteria.

That said, the criteria set out in Policy 67 in the HWLDP (Highland Wide Local Development

Plan) should provide a reasonable basis, providing a thorough independent assessment of the application is made.

Q4 To date there appears to have been little or no strategic planning with regard to siting wind farms in Highland. Developments have been approved (and occasionally refused) on an ad hoc basis, partly because Scottish ministers can overturn the more educated decisions of communities and their elected representatives. The comments provided at Q2 regarding wildlife corridors etc. are pertinent here. We also need to be mindful that the natural heritage is integral to our health and wellbeing.

The **capacity** of the landscape to accommodate further developments is one criteria which could be used, but it is subjective and there is a danger that the “big landscapes of the Highlands” may be considered to have capacity whereas in fact this is far from the case. It is the big, open landscapes such as those of the Monadhliath Mountains and the Dava Moor that many people find so awesome and spiritually uplifting. ANY industrial development in such landscapes degrades the experience.

Q5 A spatial framework which excludes consideration of cumulative and sequential impacts would have only very limited value. Therefore it is important for the Council to find a mechanism for including these criteria. The cumulative and sequential impacts of powerlines, pylons and electricity substations should be included together with wind farm developments in the planning system and where necessary the Precautionary Principle should be adopted. ENDS

Author: Pat Wells, Convener SHWC

Date : 25 January 2015