



Clatto Landscape Protection Group

November 2010

OBJECTION TO PLANNING APPLICATION NUMBER 10/02183/EIA WEST COAST ENERGY, SEVEN WIND TURBINES 121M TALL, DEVON WOOD, CLATTO HILL

SUMMARY VERSION

People living on and around Clatto Hill, coming together as Clatto Landscape Protection Group, object to West Coast Energy's proposal because there are clearly far more adverse impacts from the proposals than benefits. In addition, the huge capacity of marine renewables to meet future energy needs removes the need for problematic and divisive onshore wind projects such as this one.

West Coast Energy's Environmental Statement lacks the impartiality required by regulation and omits important information to the extent that it should not be used as a basis for determining this application. Our detailed objection provides the necessary evidence for this conclusion.

There are compelling reasons why the seven proposed industrial scale turbines should not be approved. While they would provide a very small gain in renewable energy generation and some temporary employment, they will

- Degrade the residential amenity of many local people by their visual and noise impacts,
- Introduce dominant and wholly incongruous skyline features in the landscape which would be highly visible for many miles around,
- Turn an area in which a varied range of peaceful outdoor activities take place to the benefit of peoples' health and well being into an area in which people would rather not spend time,
- Extinguish the potential for more outdoor activity utilising the area's many unique advantages in this respect,
- Have a detrimental effect on the area's wildlife, including on protected species
- Create serious driver distraction problems over many parts of the minor road C30,
- Be inconsistent with the Council's targets to increase tourism turnover by 20%, and

In addition, alternatives for generating renewable energy in the seas around Scotland abound and are rapidly being commercialised making Scotland a world leader in this area. The extent of reliance on renewables in Scottish Government policy requires a large scale contribution from marine renewables

and commercial exploitation of this resource is taking off on a scale comparable with the North Sea Oil boom. The marine resource is estimated by Government to exceed Scottish need by a factor of about 6, and a large export industry is envisaged.

In determining this application and the neighbouring application from Green Cat Renewables, the Council faces a stark choice about the future of Clatto Hill. The Hill can either become an industrial area and a blight on the landscape, or its full potential can be realised for access and recreation alongside farming and forestry. It is one or the other, and we strongly believe the latter is the correct course.

Residential Amenity

There are 16 homes within 1 kilometre, 104 homes within 2 kilometres and an estimated 1,300 homes within 3 kilometres of the proposed turbine locations. The list of properties within 2 kilometres has been supplied to the Council.

The settlements of Burnturk, Baintown and Bonnybank lie just within the 2 kilometre separation distance recognised in Fife Council and Scottish Government planning policy. The turbines would be seen from most homes within the 2 kilometre separation distance and as such constitute a serious adverse impact on residential amenity.

An overbearing impact would also be experienced by the following 15 settlements which lie between 2 and 6 kilometres from the turbine site and would have clear views:

Star of Markinch, Springfield, Leven, Montrave, Freuchie, Windygates, Rameldry, Craigrothie, Lundin Links, Kingskettle, Ceres, Markinch, Ladybank, Chance Inn and Largo.

Expert opinion on sleep disturbance (Dr Christopher Hanning) suggests that at least a 1.5 km buffer between wind turbines and peoples' homes is required to avoid sleep disturbance problems.

People living in eight homes are likely to suffer a major loss of amenity from the proposed turbines according to independent noise consultant, Dick Bowdler. His full report has been submitted to the Council.

The foregoing information provides grounds for refusal of this application in terms of

- Scottish Planning Policy (at page 69, paragraph 190),
- Policy COU19 of the Cupar and Howe of Fife Local Plan
- Policy I1 of the Finalised St Andrews and East Fife Local Plan 2009
- Policy SG1 of the Council's Supplementary Planning Guidance – Wind Energy

Landscape and Visual Impact

The seven turbines would be highly prominent as skyline features in most close and distant views of the site. They would never be "backclothed" by the landscape as required by the Fife Landscape Character Assessment. Instead the gently rolling topography of the area would sometimes partially screen turbine

towers creating images of rotating blades out of proportion with the towers. The applicant's ZTV shows how the turbines would be seen from all directions close up and as far distant as Kirkcaldy, Cowdenbeath, Auchtermuchty, Guardbridge and Elie. Sometimes screening by topography or trees would limit views, but the following image illustrates that they would mainly be highly visible. The turbines would be seen from all the main and minor roads in the area as well as most stretches of the rail line between Cupar and Kirkcaldy. The development is only 2 kilometres from the Tarvit and Ceres candidate Special Landscape Area.



Photomontage from Rameldry Mill Bank

As regards, scale, the 121 metre tall turbines would be 180 to 200 metres above sea level in an area of gently rolling topography with typically no more than 30 metres between crests and troughs in this topography. The closest local reference points for scale would be trees, no more than 15 metres tall, and local dwellings and farm buildings, never more than 10 metres tall. There are electricity pylons about a kilometre from the proposed turbine locations and two telecommunications masts about 1.5 kilometres from the proposed turbine locations. They are 40 metres tall or less. In other words, nothing topographical or in terms of features in the landscape remotely matches the massive scale of the turbines.

SNH Guidance (1) explains, "For landscape and Visual Assessment of Windfarms, the key challenge is to ascertain for what a landscape is valued and by whom, ...". Since West Coast Energy did not consult local people about their proposals, they did not identify that the local landscape is highly valued by people who live there as well as by visitors and recreational users of the area. The area offers a familiar haven of peace and tranquillity with many intimate rural settings offered by the topography. It also offers great views out in all directions.

From a landscape perspective then, the proposed development would be highly visible and grossly out of scale with the highly valued landscape it would dominate. In the jargon of landscape assessments, the proposal would be a change of considerable "magnitude" in an area "sensitive" to change. As SNH says in its consultation response, the proposal would represent a "fundamental change" to the landscape character. The clear conclusion is that the landscape cannot accommodate them.

The Fife landscape Character Assessment, for the landscape character type – pronounced volcanic hills and craigs – of this site, advises that tall structures on skylines should be limited to "those absolutely essential", that wind turbines should avoid locations where they would be seen across the Lowlands and that they should be given a landscape backdrop or "backclothing". The proposal meets none of those criteria.

While recognising its importance in forming policies about landscape, The ASH Report (2) made no attempt to ascertain local opinion about it. It also drew attention to the high rural populations of Fife, while stating that no account was taken of this in its findings. Notwithstanding these fundamental flaws, ASH concluded that there was nowhere in Fife suitable for turbines over 100 metres tall. For the landscape character type in which this proposal is set, it suggests the upper limit of its capacity to accommodate wind turbines is 5 turbines no higher than 100 metres.

The information in this section provides grounds for refusing this planning application in terms of

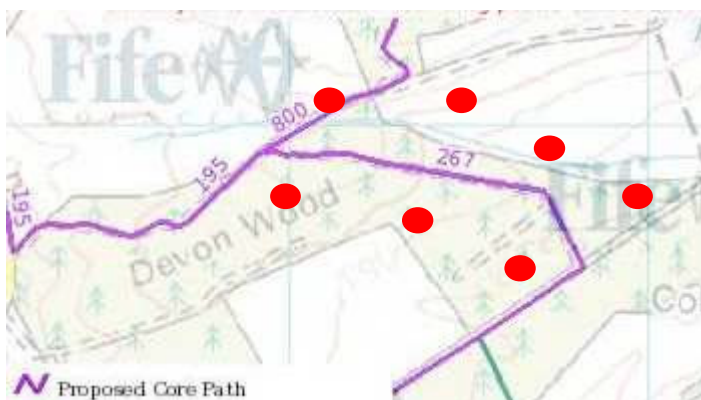
- Policy R1 of the Fife Structure Plan
- Policies E3 and E19 of the Finalised St Andrews and East Fife Local Plan
- Policy SG1 of the Supplementary Planning Guidance – Wind Energy.

Access, Recreation and Health

As an area for outdoor activities conducive to peoples' health and well being, Clatto Hill is very suitable, already popular and has potential for further expansion of this role. Contemporary policies at Government and Council level seek more locations just such as this. Current activities enjoyed by local people and visitors include walking, horse riding, cycling, bird watching, wild life observation, clay pigeon shooting, voluntary woodland management and fishing.

The area is particularly accessible for recreation as the C30 minor road brings people 200 metres above sea level into it. From many parts of the area, there are views to the Sidlaws, Grampians, Lomonds, Largo Law, the Pentlands and the Firth of Forth. Very few places in Fife can offer this with such easy access, without a stiff climb on foot, so it is ideal for young and old alike.

Core Paths 800, 195, 267 and 377 serve the area for walking and horse riding, with 277 the only path linking the northern parts of Clatto Hill to the southern parts. This map shows the turbine positions at 150 to 350 metres from that Core Path which would be less than the British Horse Society recommended minimum. There are over 120 horses stabled within 2 kilometres of the wind farm site.



Approximate turbine positions in red

National Cycle Route No. 1 linking Lands End to John O'Groats and passing through Edinburgh, Dunfermline, St Andrews and Dundee comes on to Clatto Hill and passes within 2 kilometres of the

proposed wind farm site. The turbines would be in full view for much of a cyclist's experience of this route traversing Clatto Hill and the wider area.

The area hosts Clatto Community Woodlands, a charity which owns a small wood 1.5 kilometres north of the proposed turbines. It is in discussion with a local landowner about management agreements for two more woods, one of which is only 500 metres from the turbine positions. This organisation could be the focus for expanded recreational use of Clatto Hill, while promoting biodiversity.

The detrimental impact of the turbines in this intimate landscape would extinguish the desire to use the area for recreation and jeopardise the future of Clatto Community Woodland.

The foregoing information provides grounds for refusing this planning application in terms of

- Scottish Planning Policy (at page 10, paragraphs 47 and 48, and at page 54, paragraph 257)
- Policies B2, E3 and C8 of the Finalised St Andrews and East Fife Local Plan
- Policy SG1 of the Supplementary Planning Guidance – Energy.

Bird and Other Wildlife Impacts

This proposed wind farm site is on a direct flight path between Clatto Reservoir and Carriston Reservoir used by geese and swans for feeding and roosting. Clatto reservoir is a local nature reserve and only 1.5 kilometres from the proposed wind farm site. The applicant's own ES acknowledges the presence in the area of 5 species of birds (pink-footed geese, greylag geese, merlin, peregrine and golden plover) of international conservation importance and another 14 species of national conservation importance. Whooper swans (a schedule 1 protected species) winter on Clatto Reservoir (over 100 some years). Peregrines nest in the area. Red squirrels (a schedule 5 protected species) and badgers are present in the area. The applicant has not acknowledged the presence of red squirrels and understated the presence of badgers to the extent that their proposed mitigation is unconvincing.

It seemed remarkable to us that all sightings of birds in flight in the applicant's ES were either above or below turbine blade height allowing the applicant to claim no adverse impacts on birds from their proposal. The firm carrying out the ornithology and wildlife assessments was not an independent firm, but one owned substantially by the same people who own West Coast Energy.

Nothing in the applicant's proposal offers enhancement to environmental quality or biodiversity in this rural area, quite the reverse.

The foregoing information provides grounds for refusing this planning application in terms of

- Policy SG1 of the Supplementary Planning Guidance – Wind Energy
- Policies E3, E15 and E23 of the St Andrews and East Fife Local Plan

Driver Distraction / Road Safety

The C30 minor road over Clatto Hill would pass approximately 600 metres from the turbines at the nearest point. It is narrow, features many blind summits and bends over its length and is seldom gritted in winter.

We have identified 8 specific locations where a driver on this road would find the turbines suddenly come into view providing a distraction from the driving task. Spatial Planning Advice Note SP12/09 suggests that this sort of driver distraction can be avoided by drivers being able to see turbines in the distance before coming close, a configuration impossible on this road. The problem is compounded by the nature of the road requiring particular attention while driving.

Tourism

We would be concerned that several proposals like this one in Fife would have the cumulative impact in Fife of destroying one of the things which matter most to tourists coming to Fife – the landscape. Given the importance of tourism to the Fife economy, developments such as this one are firmly at odds with the Council's aspiration to grow the tourist industry by 20% by 2020.

Government Renewable Energy Strategy

The Scottish Government has set the aim of a largely decarbonised electricity generation sector by 2030. Its Climate Change Delivery Plan (3) describes the need for extensive deployment of marine renewables and carbon sequestration and storage to achieve the aim. The potential offshore resource is considered to be about 6 times Scotland's own needs with a major new export industry in prospect.

As interim renewable energy targets are expected to be exceeded, huge developments in marine technologies are underway as the commercialisation of offshore wind, wave and tide technologies progresses. The UK Government has already issued licenses for 11,000 MW capacity in offshore wind. A substantial share of this lies off the coast of Fife. Commercial scale wave and tide generators are already being tested in Scottish waters. Scotland has a world lead in the technologies involved.

Summary

There is no overriding need to develop onshore wind projects such as this one with the following adverse impacts

- A degraded residential environment for hundreds of families,
- Turbines wholly out of scale with their environment and visible for miles around in all directions creating a wholly incongruous feature of the landscape,
- A highly valued area for peaceful recreation with potential for further development in this regard destroyed,
- Detrimental impacts on birds and wildlife including many protected species, and
- A reduction in road safety on the C30 over Clatto Hill through driver distraction problems,

given that

- the Government's interim renewable electricity generation targets are expected to be comfortably exceeded,
- the scale of Scotland's marine renewable energy potential vastly exceeds its own needs,
- the commercialisation of this resource is now well underway,
- vital work is being done to make carbon sequestration and storage viable, and
- Fife has every expectation of being a substantial player in the blossoming marine renewable industry and in developments in carbon sequestration.

CLPG therefore urges the Council to refuse the planning application from West Coast Energy.

Greg Brown, chair

On behalf of Clatto Landscape Protection Group

References

- (1) Siting and Designing Windfarms in the Landscape, Scottish Natural Heritage, December 2009
- (2) Identifying Areas of Search for Groupings of Wind Turbines in Fife, ASH Design and Assessment
- (3) Climate Change Delivery Plan – Meeting Scotland's Statutory Climate Change Targets, The Scottish Government, June 2009