

**Clatto Landscape Protection Group**

People who live on or around Clatto Hill between Cupar and Kennoway protecting landscape and amenity

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West Cottage

Clatto Farm

Cupar

Fife, KY15 7TG

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**11 March 2011**

**OBJECTION TO PLANNING APPLICATION NUMBER 10/02183/EIA – FULL VERSION**

**WEST COAST ENERGY, SEVEN WIND TURBINES 121M TALL, DEVON WOOD, CLATTO HILL**



**Clatto Hill lies in the centre of this picture looking towards the Lomonds. The white circle marks the location of the proposed turbines**

1. The Clatto Landscape Protection Group objects to West Coast Energy's proposals because there are clearly more significant adverse impacts than benefits. For our Group, the decision to object stems from local knowledge, careful study of the proposal and West Coast Energy's Environmental Statement, visits to other windfarms and a study of relevant planning policy which lends considerable support to our view.

2. The seven proposed industrial scale turbines would provide a very small gain in renewable energy generation and some temporary employment, while

- Degrading the residential amenity of many local people by their visual and noise impacts,
- Introducing a dominant and wholly incongruous skyline feature in the landscape which would be highly visible for many miles around,
- Turning an area enabling a varied range of peaceful outdoor activities by local people and recreational visitors to the benefit of their health and well being into an area in which most people would rather not spend time,
- Extinguishing the potential for more outdoor activity utilising the area's unique advantages in this respect,
- Having a detrimental effect on the area's wildlife, including on protected species
- Creating serious driver distraction problems over many parts of the minor road C30,
- Being inconsistent with the Council's targets to increase tourism turnover by 20%, and
- Alternatives for generating renewable energy in the seas around Scotland abound and are rapidly being commercialised making Scotland a world leader in this area.

3. Locations for wind farms with an accumulation of adverse impacts like this one are quite unnecessary as the potential for marine renewable energy generation has been shown to exceed current requirements by a factor of about six. The work of developing this in commercial form is well underway with high levels of Government support. The prospects are for Scotland and the UK to become net exporters of energy on a scale comparable to the North Sea oil boom, as the marine renewables energy industry is grown with many thousands of sustainable jobs, including manufacturing jobs in Fife and throughout Scotland. Given this context, the proposal in question is all but irrelevant.

4. We submit that the Environmental Statement submitted by West Coast Energy is not fit for purpose and therefore non-compliant with the EIA(S) Regulations 1999 through lack of impartiality and omission of information inconvenient to its application. We do not believe the Council should accept the Environmental Statement as a basis for determining the application.

5. This and a neighbouring wind farm proposal put a stark choice before the Council for the future of Clatto Hill. Either the Hill can become an industrial area or one that, alongside farming and forestry offers gradually improving access and recreational use as a contribution to the health and well being of residents of East Fife and its many visitors.

**According to the Scottish Government's Scottish Planning Policy (SPP page 54, paragraph 257), "the planning system should be judged by the extent to which it maintains and creates places where people want to live, work and spend time." This proposal would seriously diminish the desire to live in the area and remove any desire to spend time in it.**

6. The evidence and argument for the foregoing is developed in more detail below.

## RESIDENTIAL AMENITY

### Proximity of Turbines to Peoples' Homes



People live on Clatto Hill – lots of people! A view of Burnturk/Kettlehill and the Howe of Fife

7. Both the Government's **Scottish Planning Policy (SPP)** (page 69, paragraph 190) and Fife Council's **Supplementary Planning Guidance – Wind Energy 2008** (paras. 5.14 and 5.15) on the siting of wind farms acknowledges the scope for adverse visual impact of turbines located within 2 kilometres of residential property. Indeed, Scottish Ministers attitude to the 2km separation distance was clarified in a letter from the Scottish Government in January 2009 (appended). It states, *"The 2km separation distance is intended to recognise that, in relation to local communities, visual impacts are likely to be a prominent feature ..."* and *"... in all instances, proposals should not be permitted if they would have a significant long term detrimental impact on the amenity of people living nearby. This principle applies to houses within and outwith 2km of the proposed development regardless of whether they are single dwellings or part of a settlement"*.

8. There are 19 homes within 1 kilometre, 114 homes within 2 kilometres and an estimated 1,300 homes within 3 kilometres of the proposed turbine locations. A dwelling proximity plan prepared by Mark Steele Consultants is appended, which shows the distribution of the dwellings up to 2km range. The edge of the conjoined villages of Coaltown of Burnturk and Kettlehill and the villages of Baintown and Bonnybank lie just under 2 kilometres from the proposed turbine locations. In addition, the northern residential areas of Kennoway lie between 2 and 3 kilometres of the proposed turbine locations. The turbines would be seen from most of the aforementioned homes and settlements.

9. There is no direct reference to turbine height in policy on the 2km separation distance. Clearly the larger the turbines, the more likely they are to be visually intrusive to residential amenity. The 121m turbines are at the upper end of the range of sizes of onshore wind turbines in Scotland. A careful reading of West Coast Energy's Environmental Statement does confirm that the turbines would be visible from approximately 85% of dwelling locations within a 2.5km distance of the turbines. Thus there are no mitigating circumstances in this case that should overturn the application of the 2 kilometre separation distance. This principle was endorsed in the Auchtermuchty Inquiry and at Gathercauld.

10. In their Environmental Statement, West Coast Energy never offer an appreciation of what it would be like to live very close to their proposed turbines. They carefully avoid stating the numbers of people living close by. Instead they make frequent use of the word "sparse" to create a false impression that few people live in the locality of their site. They dismiss the significance of views of turbines from peoples' homes if their windows are small, or offer oblique



views, or are north facing. Landscape Institute “Guidance for Landscape and Visual Impact Assessment” paragraph 7.30 states that “It is therefore important to assess all effects on public views and those from the curtilage of adjacent or nearby owners or occupiers within the same locality” (not just the principal elevation). WCE’s L&VA does not follow that guidance. The reality for people living close by is that the turbines would be a relentless overbearing presence, whether as seen from windows of whatever orientation, gardens, in close proximity to homes, or while driving, riding, walking and cycling in and around the area.

11. The following settlements also lie so close to the proposed turbines as to have an overbearing visual impact.

Star of Markinch 5km	Springfield 5.5km	Leven 4km
Montrave 2km	Freuchie 6km	Windygates 4.5km
Rameldry 4km	Craigrothie 5 km	Lundin Links 5.5km
Kingskettle 4 km	Ceres 6.5km	Markinch 6km
Ladybank 5.5km	Chance Inn 4.5km	Largo 6 km

From visiting wind farms with turbines of the height proposed here, it is clear to us that even 6 kilometres from the turbines, they appear as dominant features in the environment. In addition to the above settlements lying within 6 kilometres of the turbines, there are several hundred homes scattered throughout the countryside. In our submission, something of the order of 10% of Fife’s population would be adversely affected.

12. This photomontage indicates that the turbines would have a dominating presence over much of the Howe of Fife.



**Above - The proposed turbines on Clatto Hill from Heatherhall Woods near Ladybank. Distance to nearest turbine 6.5 km. This view is also representative of those from the A92 North of Freuchie and the Railway around Ladybank. Note how prominent the turbines are compared to the Down Law communications masts which are much closer to this viewpoint than the turbines**

13. From our concern for the numbers of people expected to live close to turbines of the proposed scale, our Group asked West Coast Energy to give us examples of existing Scottish windfarms in similar proximity to peoples’ homes. They offered Earlsburn in Stirlingshire as an example. We visited that windfarm and made the following comparisons.

14. At Earlsburn, there are only 3 dwellings within 2km of turbine locations, compared to 114 in this application. At Earlsburn there are only 10 dwellings within 3km of turbine locations, compared to at least 1,300 in this application. At Earlsburn, there are two settlements at a distance of up to 6km from turbine locations (Gargunnoch and Fintry) and no dwellings in these settlements see the turbines. By comparison, in this application, there are seventeen settlements within 6km of the turbine locations, in which many of the dwellings would see the turbines. So what West Coast Energy consider to be a similar proposal in terms of proximity of turbines to where people live, turns out to be totally different. The WCE proposal would create a disastrous precedent in terms of very large turbines being sited close to peoples' homes.

15. **Policy I1 of the Finalised St Andrews and East Fife Local Plan 2009** states that development would be supported where it does not have a significant adverse impact on local communities. **Policy COU19 of the Cupar and Howe of Fife Local Plan** states the same thing. **Policy SG1 in the Council's Supplementary Planning Guidance – Wind Energy** indicates that development would be supported where they do not have a significant detrimental effect on the amenity of nearby residents. We contend that the industrial scale of 121 metre tall wind turbines would have an obvious detrimental visual impact on nearby residents and the local community and therefore that these policies provide grounds for refusal of this planning application.

### **Noise Aspects of Residential Amenity**

16. In a Report (1) published in June 2009, Dr Christopher Hanning BSc, MB, BS, MRCS, LRCP, FRCA, MD considering sleep disturbance and wind turbine noise concluded *"In my expert opinion, from my knowledge of sleep physiology and a review of available research, I have no doubt that wind turbine noise emissions cause sleep disturbance and ill-health."* (para. 3.8.3, page 17). With regard to the ETSU-R-97 approach to noise assessment he says, *"it is clear that ETSU-R-97 cannot be relied upon to prevent sleep disturbance in those living near wind turbines."* (para.4.2.6, page 20). His overall conclusion is that, *"The only mitigation against sleep disturbance from industrial wind turbine noise is a setback of at least 1.5 km and probably greater."*

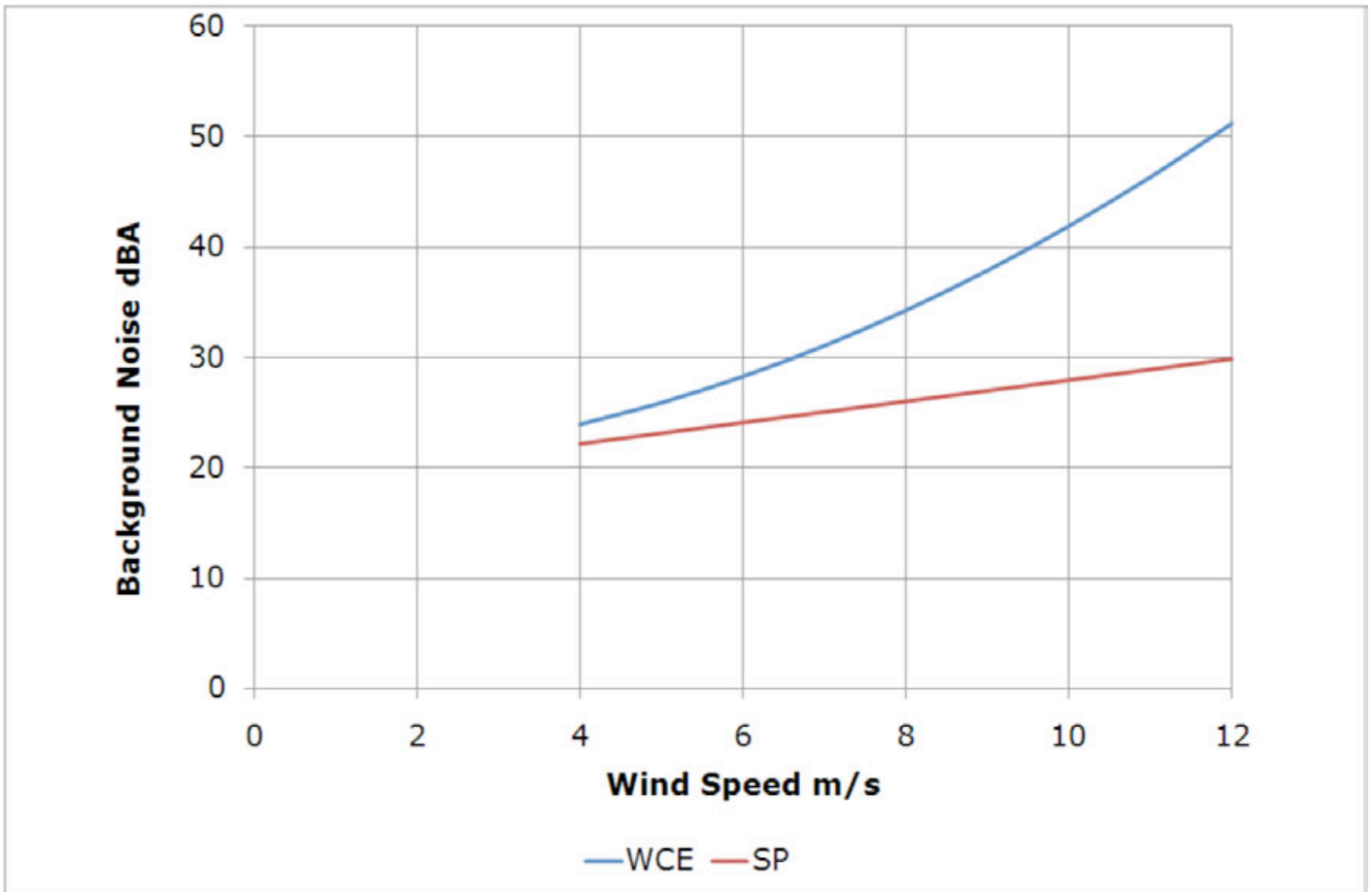
17. Local concern about possible noise impacts on nearby dwellings, both from health and nuisance perspectives, led CLPG to engage the experienced acoustic consultant, Dick Bowdler, to investigate this matter on our behalf. Mr Bowdler has concluded that 8 homes are likely to suffer a major loss of amenity. This is a different conclusion from that of West Coast Energy and seems to arise in part because of their unreliable background noise measurements and in part because they failed to consider the increases in ambient noise which the development would cause, as required by **PAN 56**. Mr Bowdler's Report (2) has been submitted to the Council under separate cover in support of this objection. In its Statement of Case for the Rossie, Auchtermuchty Planning Appeal, November 2007, Fife Council (para. 3.3) stated, *"the noise limits in ETSU-R-97 do not represent noise thresholds of adverse noise impact, and application of these limits does not necessarily provide adequate protection to residential amenity, particularly in areas where background noise levels are low, such as they are in this appeal. Application of the ETSU noise limits in quiet rural areas permit wind turbines to generate higher levels of noise than would be permitted for any other form of industrial development."* The same document also stated, *"Following guidance in PAN 56, assessment of noise impact should also take account of the increase in ambient noise resulting from the operation of a wind farm."* In his Report, the Reporter in that case endorsed these policy requirements. Needless to say, CLPG seeks consistency of approach to noise on the part of the Council, with regard to the quiet rural area of Clatto Hill and noise sensitive properties.



**This photograph is of WCE's noise measuring station at Devon Cottage. It illustrates an unsatisfactory approach to background noise measurement.**

18. The following graph of noise measurements taken at Clatto Cottages (source: Dick Bowdler) is an example of West Coast Energy's consistently higher measurement of background noise compared to that of Scottish Power 7 years ago. The noise measuring station at Clatto Cottages was the same as at Devon Cottage (see photo above). Inappropriate siting of equipment may explain the anomaly.





19. West Coast Energy acknowledged a noise problem at the 2 homes on Clatto Barns Farm. They then dismiss the relevance of this claiming financial involvement in the scheme. CLPG has repeatedly sought clarification of this from West Coast Energy without success. The owner of the two properties does not and never has lived at Clatto Barns – he lives over 50 miles away! Financial involvement that is relevant in this context would have to relate to residents, not just owners. One of the properties is tenanted and the other is empty for the time being. Neither in the Environmental Statement nor in explanations to CLPG has West Coast Energy demonstrated any genuine financial involvement on the part of residents of Clatto Barns. The reality is that the 500 metre distance from the turbine locations would blight those properties for current and future occupiers.

20. **Policy SG1 in the Council’s Supplementary Planning Guidance- Wind Energy** indicates that development would be supported where it does not have a significant detrimental effect on the amenity of nearby residents. Mr Bowdler’s report demonstrates that the development would have a significant detrimental effect on nearby residents. Dr Hanning’s Report does likewise.

21. In March 2010, a wind farm developer was instructed by the Courts in France to remove 4 turbines near the village of Navian in Languedoc. The turbines were sited between 600 metres and 1500 metres from residential property. The grounds for the Court’s decisions were actual visual and noise nuisance from their presence. For us, the significance of this is that actual noise levels led to the Court’s radical decision, not predictions which are widely acknowledged to be difficult to make with any certainty. (3)

22. Fife Council’s **Supplementary Planning Guidance – Wind Energy** requires the impacts of ultrasound and infrasound to be assessed. The applicant has not done this, serving only to heighten the local community’s concerns on these poorly researched aspects of noise emissions.

## LANDSCAPE AND VISUAL IMPACT

23. According to **Scottish Planning Policy**, at paragraph 187, the key issues on the landscape and visual impact of a windfarm development are the aims of reflecting *"the scale and character of the landscape"* and ensuring *"that the landscape and visual impact is minimised."* Council Policy **SG1** in the **Supplementary Planning Guidance – Wind Energy** indicates that support for windfarm proposals is dependent on *"the landscape being able to accommodate them"*.

24. From the local knowledge of our Group and reference to guidance, it is clear that these criteria are not met by the West Coast Energy proposal.

25. **The Fife Landscape Character Assessment** describes at Figure 2 that Clatto Hill is part of one of Fife's "principal hill ranges." In this proposal, the bases of the seven 121 metre tall turbines would be 180 to 210 metres above sea level on a gentle slope near the top of Clatto Hill, which is 248 metres above sea level. The tip of the highest turbine would be 331m (or 1086 feet) above sea level. For a comparison, the top of Largo Law is 290 metres above sea level. The only things in Fife which would be higher than the turbines would be the peaks of East and West Lomond. As such, the turbines would be within view of most of the area bounded by the north east edge of Kirkcaldy, Cowdenbeath, Auchtermuchty, Guardbridge and Elie. The applicant's Zone of Theoretical Visibility maps demonstrate this. Local people already know that Clatto Hill can be seen over this range, without turbines on it. Distant views would see 121 metre turbines near the top of a 248 metre hill.

26. The turbines would be highly prominent skyline features in views from all directions. They would never be seen with a landscape backdrop. By contrast some views would hide lower sections of turbine towers giving views of towers and blades out of proportion. Other views would show turbine blades appearing and disappearing as they rotate.

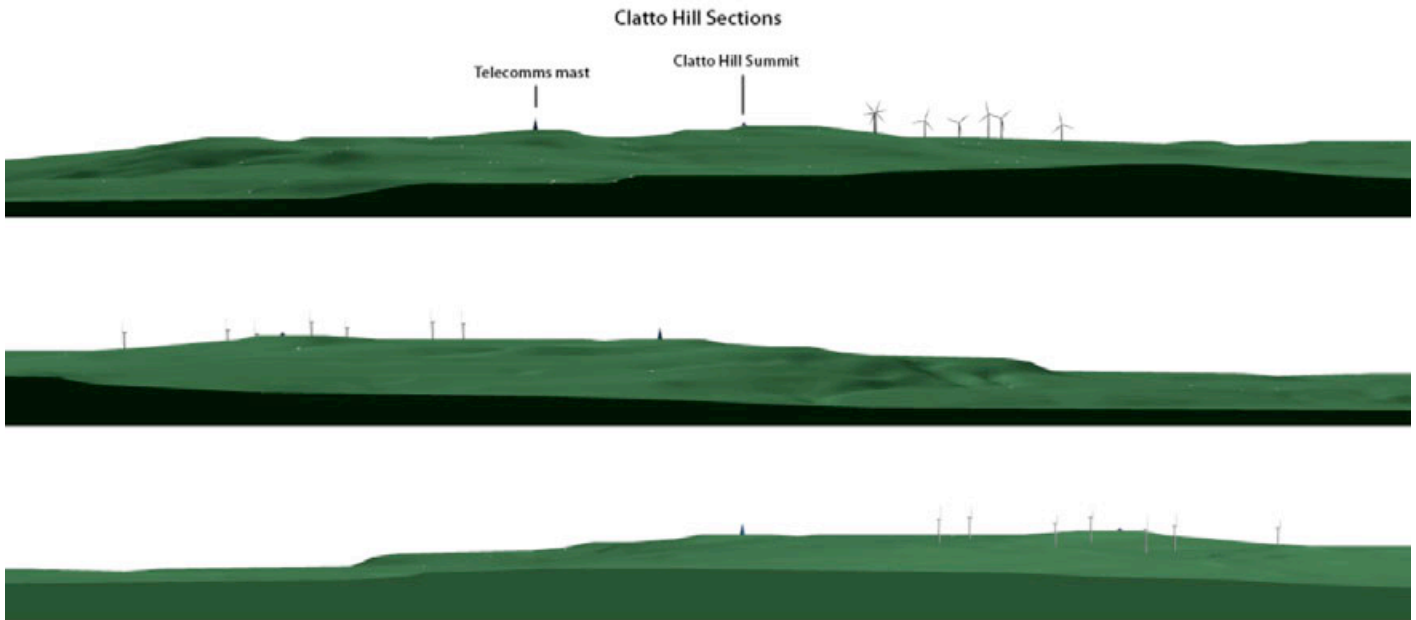
27. The turbines would be seen by rail travellers from most of the stretch between the north eastern edge of Kirkcaldy and Cupar. They would also be seen from most of the nearby main roads - the A92 from the north eastern edge of Kirkcaldy beyond Ladybank, the A914 from its junction with the A92 to Cupar, most of the A91 from Auchtermuchty to Cupar and along the A916 between Hill of Tarvit, Craigrothie and Kame Bridge. In short whoever is travelling by road or rail within about 15 kilometres of the turbine site would see them.

28. The proposed turbine site lies close to and between two nearby candidate Special Landscape Areas. Their prominent location means that they will be visible from most locations in those cSLAs. The applicant's ZTV in their ES verifies this. In the case of the Tarvit and Ceres cSLA its boundary is only about 2 kilometres from the proposed turbine locations.

29. West Coast Energy makes the unsubstantiated claim that topography and vegetation would often screen views of the turbines. We believe this claim greatly exaggerates the reality, which is that the turbines would be seen most of the time by anyone moving around in the area. The only significant exception is in the vicinity of Pitlessie and Balmalcolm. The height variation in the gently rolling topography is no more than 30m, a quarter of turbine height. Local mature trees are no more than 15m tall, an eighth of turbine height. Most woodland in the area is mature commercial forest and cannot be relied upon for screening as it will be felled during the proposed life of the windfarm.

30. The following cross sections of Clatto Hill illustrate the relative scale of the topography and the turbines.





31. The visualisation below is an illustration of the ineffectiveness of trees for screening, absence of landscape backdrop, truncated views of towers showing towers out of proportion with blades and blades intermittently breaking the skyline.



Montage of turbines from minor road near Kame Bridge (A916), 75mm lens, nearest turbine 3.25Km

32. The next visualisation illustrates how neither local topography nor forests can contribute meaningfully to screening.



### **Montage of Clatto Hill from Rameldry Mill Bank 4km from the turbines**

These illustrations are “middle distance” rather than very close or very far, but hopefully make the required points convincingly. The production of the above montages followed the guidance issued by Highland Council (4).

### **Accommodation in the Landscape**

33. Two documents with an important bearing on windfarms being accommodated in the landscape are The Fife Landscape Character Assessment 1999 and SNH’s “Siting and Designing Windfarms in the Landscape”, 2009 (5).

Paragraph 1.8 the SNH guidance explains the aim of accommodating windfarms into the landscape, by relating them well to their setting and minimising landscape and visual impacts. Starting on page 111, section D.4 of the FLCA offers advice specifically relating to tall structures in the Pronounced Volcanic Hills and Craigs landscape character type in which the WCE proposal is set.

34. We have already drawn attention to the absence of backclothing and to the prominence of the turbines as skyline features. There are some important references to skylines and backclothing in the aforementioned documents.

Included in section D.4 of the FLCA are the following statements:

*“The very distinctive, recognisable and prominent hill tops, peaks and skylines should be left free of all forms of development, to maintain their distinctive character.”*

*“Restrict the development of tall structures to those absolutely essential for operational reasons and avoid any new installations of masts, wind turbine generators or other tall or industrial like structures on all the distinctive, recognisable and prominent hill tops, peaks and skylines.”*

*“Where possible, encourage masts and other tall structures to achieve “backclothing” ..... so that the skyline features are minimised.”*

*“Explore the potential to steer wind farm developments away from exposed and steep ridgelines and summits and from locations where their visual influence would extend across the lowlands.”*

*“Maximise the amount of backclothing provided by the natural landform.”*

Paragraph 4.28 of the SNH guidance includes the following statements:

*“Skylines are of critical importance.”*

*“The viewer’s eye is naturally drawn to skylines, ....”*

*“The character of a skyline may be particularly valued ..... if it forms the backdrop to a settlement, if it comprises a particularly distinctive landform ....”*

And in paragraph 4.29:

*“..... Design of a windfarm from key viewpoints and sequential routes should ensure a windfarm does not detract from the character of a distinctive skyline.”*

*“Care should be taken to ensure that the windfarm does not overwhelm a skyline.”*

*“If the skyline is simple in nature, for example over moorland and hills, it is important that wind turbines possess a simple visual relationship to this feature, avoiding variable height, spacing and overlapping of turbines and also, visibility of blade tips intermittently “breaking” the skyline.”*

35. The FLCA seeks to protect the distinctive skylines of the Pronounced Volcanic Hills and Craigs from adverse impact by avoiding tall structures altogether and seeking backclothing for any tall structures. The SNH guidance advises that windfarms should not detract from or overwhelm skylines. The area’s skylines do form a backdrop for settlements to the east, south and south east contributing significantly to their being valued by local people. The developer has been unable to avoid blade tips intermittently breaking the skyline and the overlapping of turbines (stacking) from views from the west-north-west and east-south-east. In short, WCE’s proposal fails on every count to follow the foregoing advice and guidance with regard to skyline and backclothing.

#### **Scale**

36. It is quite evident that the proposed turbines would be out of scale with the receiving landscape. As already explained, the topographical variation is modest, and the immediate surroundings have nothing other than trees and houses to offer scale comparisons. About 1km away there are pylons less than 40m tall and about 2km away, there are masts on Down Law about 40m tall. SNH guidance at paragraph 4.31 refers to scale in terms of *“relative size between elements”*. There is absolutely nothing that offers a reasonable scale comparison for 121m turbines. Yet WCE in their Environmental Statement repeatedly claim that their proposed turbines would represent *“a minor feature”* in views of the Clatto Hill / Devon Wood area. How can that be an apt description of 121m tall turbines set at around 190m above sea level on the slopes of a hill whose peak is 248m?

37. Addressing the need to achieve appropriate scale, The SNH guidance includes in paragraph 4.33

*“... the development will need to ensure that the windfarm in relation to the following aspects, is:*

*– Of minor vertical scale in relation to the key features of the landscape (typically less than one third); .....”*

WCE’s proposal clearly does not achieve this. At paragraph 4.55, the SNH guidance is specific about trees

*“... where windfarms are sited immediately adjacent to, or within woodland areas, trees may act as a scale indicator accentuating turbine size in comparison.”*

That is exactly what happens in WCE’s proposal.

38. WCE attempt to dismiss the ASH Report. However, ASH could find no landscape character type in the whole of Fife capable of siting even one turbine over 100m tall, never mind seven 20% taller than this. It should be

remembered that the ASH study was restricted to landscape assessment and not visual assessment, as paragraph 2.3 of their Report clarifies, in recognition of the *“high density of visual receptors”* in Fife.

39. In consideration of scale and visibility, we want to stress that very large numbers of people would see the turbines relentlessly at close quarters as they get on with their lives. It’s not as if those issues of scale and visibility are being considered in some remote area.

40. All of the factors described here – the high visibility from near and far as skyline features with no landscape backclothing, the gently rolling topography, the scale of current landscape features, close proximity to a large number of key visual receptors and the size of the proposed turbines themselves – point inexorably to the conclusion that WCE’s proposal would create a high magnitude of change.

### **A Valued Landscape**

41. The landscape in and around WCE’s site is valued by local people and recreational visitors alike. In their Environmental Statement, WCE make no reference to this, as no attempt was made on their part to ascertain local or recreational visitor opinion. Yet judgements about a landscape’s sensitivity to change must include knowledge of this. Indeed, in their guidance, SNH at paragraph 4.11 states that *“the key challenge with respect to landscape value is to ascertain for what a landscape is valued and by whom.”* Although other things also come in to a judgement about sensitivity to change, conclusions surely cannot be made without knowledge of how the landscape is valued.

42. To clarify what this landscape is valued for and by whom, the first aspect is the intimate rural scale as an accessible place to live. Secondly, for recreational visitors as well local people, the area is very attractive for quiet outdoor recreation of various types – see the next section. The gently varying topography means that moving around in the area is easy and offers a varied and interesting experience. In addition there are many locations where the views out from the area are stunning in all directions and for great distances. Yet the area is accessible for all ages. The road over Clatto Hill must be among the highest above sea level in all Fife. It should be very evident that the area is conducive to the health and well being of all those who use it.

43. The **Fife Landscape Character Assessment** states in its introduction that *“landscapes are valued and often cherished by those who live and work in them, or visit or travel through them.”* Further on page 23 it states that *“The landscape can therefore hold a special meaning for many people as the source of numerous experiences and memories. Many of them are visual, but at times the landscape may also invoke other sensual, cultural or even spiritual responses.”* Those statements help explain the value local people and visitors alike attach to Clatto Hill, its surroundings and the peace and tranquillity to be found there.

44. The way in which this landscape is valued by local people and recreational visitors, the peace and tranquillity of the area and the small human scale of current development suggests a landscape highly sensitive to change. The fact that the **Fife Landscape Character Assessment** seeks the avoidance of tall structures on prominent and recognisable skylines underlines this sensitivity.

45. The combination of high sensitivity to change and the high magnitude of change implied by the proposals result in an adverse landscape and visual impact of a very high order.

46. We note that the **MOD** would require lights to be fitted as high as possible on the turbines. Such a step would introduce light pollution in an area with no light pollution exists at present, which is greatly appreciated by residents. This in itself would be another adverse visual impact of the proposal.



47. **Scottish Planning Policy**, at paragraph 187, sets the aim for windfarms of reflecting “*the scale and character of the landscape*” and ensuring “*that the landscape and visual impact is minimised.*” The WCE proposal does not meet this aim.

48. **Policy SG1 of the Supplementary Planning Guidance – Wind Energy** indicates that wind farms will be supported where “*the landscape is capable of accommodating them.*” It is clear from the foregoing that the landscape cannot hope to “accommodate” this proposal. The attempt to assert that it can in the applicant’s rather self-serving Environmental Statement is hollow. It is also clear that no account has been taken of the **Fife Landscape Character Assessment** in formulating this proposal. **Fife Structure Plan Policy R1** states that the **Fife Landscape Character Assessment** will be a material consideration in the siting of wind turbines.

49. **Policy E3 of the Finalised St Andrews and East Fife Local Plan** requires development to make a positive contribution to the quality of the local environment. It is impossible to see how this proposal makes any contribution whatsoever to the quality of the local environment, quite the reverse. **Policy E19 of the St Andrews and East Fife Emerging Local Plan** requires proposals which may impact upon a Special Landscape Area to demonstrate how the development will “*contribute to the preservation, restoration, or enhancement*” of it and “*its associated landscape qualities.*” West Coast Energy has made no attempt to demonstrate this and we do not believe this can be demonstrated.

50. The foregoing four policies provide strong grounds for refusal of this application.

51. The **Council’s Strategic Environmental Assessment of the Supplementary Planning Guidance – Wind Energy** states that the application of the **Supplementary Planning Guidance – Wind Energy** would ensure that “*only proposals which can demonstrate that they will not result in adverse impacts on the natural, built and historic environments and their neighbours would be permitted. Each development will require to demonstrate that their proposed development incorporates any necessary mitigation measures to achieve acceptable standards.*” The applicant never admits to any adverse impacts from their proposal. It follows that no substantive mitigation of adverse landscape and visual effects or adverse effects on residential amenity has been attempted, and this is born out by the environmental statement itself.

## **ACCESS, RECREATION AND HEALTH**

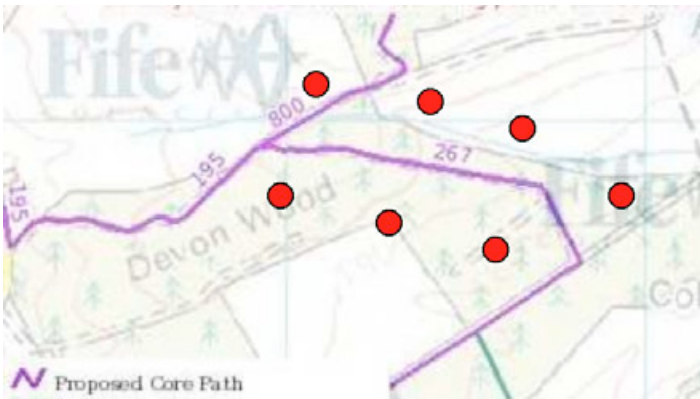
52. Policies at Scottish Government and Fife Council level have been developed in recent times to encourage people to spend more time in outdoor activities in the interests of their health and well being. The realisation of such policies requires an expansion of attractive locations for their pursuit.

53. Clatto Hill and its surrounding area is just such a location. It is easily accessible being served by a minor road bringing people 200 metres above sea level (quite rare in Fife). From many parts of the area it is possible to enjoy fine views of the Sidlaw Hills and the Grampians to the north, the Lomonds and beyond to the west, Largo Law to the east and the Pentlands and Firth of Forth to the south. 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.

54. Indeed the **Fife landscape Character Assessment** (para.E.2.5, page 152) acknowledges the value and further potential of the area for outdoor recreation. Fife Council has in 2010 used the Clatto Hill location to make a video promoting access to the local countryside and featured photographs from the area in its newspaper in this context.

55. Reflecting the potential on Clatto Hill, the proposed **Core Path Network** includes core paths 800, 195, 267 and 377 in the area as well as several other long established existing paths .. Core Path 267 is of particular importance as the only one linking the northern part of Clatto Hill to its southern slopes. West Coast Energy proposes siting its seven

turbines in two rows on either side of this core path with the turbines positioned between 150 metres and 350 metres from it. The British Horse Society recommends a separation distance of at least three times overall turbine height (in this case 363m) from paths used by horses. All turbine locations fail that test.



Approximate turbine positions in red

56. Fife Council together with Visit Scotland invest in attracting cyclists from all over the world to this area. National cycle route No.1 linking Lands End to John O'Groats, passes through Edinburgh, Dunfermline, St Andrews and Dundee, and comes on to Clatto Hill as it does so. National Cycle route No.766 linking Kirkcaldy, Glenrothes and Dundee comes within 2 kilometres of Clatto Hill. Cyclists on both routes would see the turbines at close range much of the time. This adverse impact for cyclists would surely run counter to the aforesaid promotional investment.



**Montage of the proposed turbines as they would be seen from the Gateway Community Woodland. The next opportunity for extending Clatto Community Woodlands' interest on the Hill is the wood on the right. Distance to turbines 1.5 km.**

57. There is a local community controlled charitable company limited by guarantee, **Clatto Community Woodlands (CCW)**, which owns a small wood 1.5 km north of the proposal, which the applicant fails to recognise in the Environmental Statement. **CCW** is in discussion with a local landowner about formal management agreements for two more woodlands. One of those lies less than 500 metres north of the nearest proposed turbine location. A Feasibility Study funded by a £10,000 Lottery Grant has confirmed their potential for development as community woodlands, gradually replacing commercial conifers with native species, promoting recreational use and biodiversity, and exploring possible community micro-business seeding. This is in keeping with **Fife Landscape Character Assessment** (para. E.2.7) on the management of the Pronounced Volcanic Hills and Craigs landscape character type and in keeping with **Scottish Planning Policy** (para.149 on page 30) which expects planning authorities to protect and

enhance open spaces for recreation. **CCW** have reported a marked decrease in the motivation of volunteers created by the mere threat of wind farm development in the area. A considerable risk exists of losing completely this charitable organisation and all its potential for sustainable development, were the development of this wind farm to proceed.

58. The current diverse range of outdoor activities of walking, shooting, voluntary woodland management, cycling, horse riding, dog walking, bird watching, clay pigeon shooting, observing wildlife and fishing provide ample evidence of the attraction and further potential of the area for access and recreation. Our own census of horses stabled within 2 kilometres of the proposed turbine locations revealed there are at least 120. In addition to local riders, visiting riders undertake endurance riding and carriage driving activities in the area.

59. In light of the foregoing, the potential for increased access to Clatto Hill by both tourists and local people is clear.

60. The very character of the area which attracts people for the current wide range of outdoor activities would be destroyed by the impact of the proposed development, making it an area where people would not want to spend time, the reverse of the very specific outcome sought by **Scottish Planning Policy** (SPP para. 257). In addition, the wind farm site would, in common with others built, have boundary notices discouraging access on safety grounds. To our Group, this seems perverse in a location ripe for further development for access and recreation, and in which local people have devoted their voluntary time to help make it happen. The **Scottish Planning Policy** (SPP page 10, paragraphs 47 and 48) requires the planning system to safeguard and enhance an area's environmental quality to the benefit of tourism and recreation. The same **Scottish Planning Policy** (SPP page 30, paragraph 149) seeks the promotion of access to good quality open space and recreation to promote health and well being. Clatto Hill is conveniently close to the large centres of population of Kirkcaldy, Glenrothes, Leven and Cupar to have such a role, and its development in this way could help relieve pressure on other sensitive areas.

61. Several policies in the **Finalised St Andrews and East Fife Local Plan** would be contradicted by the proposal. **Policy B2** contains a presumption against loss of facilities with a valuable community purpose. **Policy E3** requires development to make a positive contribution to the quality of the immediate environment. **Policy C8** requires footpaths to be kept open and free from obstruction, or suitable alternative routing provided. The proposals contain no alternative routing for Core Paths 267 or 800 adjacent to the proposed turbine site. In any case, the development would undermine the usefulness of a path for reasons described earlier. Since local residents make good use of the local area for access and recreation, **Supplementary Planning Guidance Wind Energy, Policy SG1**, would be negated by the significant detrimental effect of the proposals on the amenity of the nearby residents. These four policies provide grounds for refusing this application.

## **BIRD AND OTHER WILDLIFE IMPACTS**

62. The Clatto Hill area supports a wide variety of habitats for wild animals and birds. It is on the direct flight path between Clatto Reservoir and Carriston Reservoir used by geese, swans and other wildfowl for feeding and roosting. The nature reserve at Clatto Reservoir is noted in the Fife Local Biodiversity Action Plan as one of Fife's most important wildfowl sites. Clatto Reservoir is only 1.6 km from the proposed turbine locations. Clatto Hill is surrounded by four special protection areas – Firth of Forth, Firth of Tay, Cameron Reservoir and the Eden Estuary.

63. The applicant's own Environmental Statement acknowledges the presence of 5 species of birds (pink-footed geese, greylag geese, merlin, peregrine and golden plover) of international conservation importance and 14

additional bird species (curlew, lapwing, kestrel, herring gull, skylark, fieldfare, song thrush, redwing, starling, linnet, lesser redpoll, crossbill, bullfinch, and yellowhammer) of national conservation importance.

64. The applicant's Environmental Statement however failed to mention the presence of whooper swans – a schedule 1 protected species – which overwinter on Clatto Reservoir (over 100 some years) and which fly between Clatto Reservoir and Carriston Reservoir. Likewise the applicant's Environmental Statement failed to mention the small population of red squirrels present in the area. Red squirrels are a schedule 5 protected species.

65. The varied wildlife and birds on and around Clatto Hill are a source of interest to many local people and visitors alike.

66. Having studied the ecology and ornithology section of the applicant's Environmental Statement, it is clear that the inadequate periods of survey limiting the thoroughness of observation possible and the failure to take a broad overall picture make the findings fundamentally flawed. Examples of the former are the failure to note the breeding presence of peregrine and the presence of red squirrels. This year, four peregrine chicks were successfully fledged. Examples of the latter are to make the obvious connection between Clatto Reservoir and Carriston Reservoir for regular flights of geese and swans straight through the proposed wind farm site, and flight movements of birds between the four special protection areas sometimes inevitably crossing Clatto Hill.

67. CLPG submits that it is all too evident that this wind farm proposal would both disturb habitat during construction and cause bird kills during operation. It is disingenuous of the applicant to have us believe that flight movements are typically under turbine blade height or over turbine blade height. The blade tip speeds of turbines of the size proposed are of the order of 150 mph! For insect eating birds and bats, the turbines are a danger because of the heat generated at the nacelle of the turbines tending to attract insects. The birds and bats follow their prey. For bats this phenomenon is quite well documented. CLPG further submits that the major disruption and forest removal associated with this proposal would be damaging to red squirrels and badgers. There are many more badger setts on Clatto Hill that the applicant has reported and the badgers' area of foraging is very widespread. For that reason, the limited mitigation offered by the applicant with regard to badgers is unconvincing.

68. Our Group would be concerned that any reliance be placed on the Ecology and Ornithology section of the Environmental Statement contributed by Atmos Consulting for West Coast Energy. Atmos is 97% owned by the same few people who own West Coast Energy. Thus, any claim to be independent and impartial has no foundation and that part of the applicant's Environmental Statement should be regarded as inadmissible.

69. **Supplementary Planning Guidance Wind Energy, Policy SG1** indicates that wind farm proposals would not be supported where they are located on flight paths between breeding and feedings areas. This proposal is on such a flight path for geese and swans. The applicant's Environmental Statement ecology and ornithology section failed to mention this relevant policy. It also failed to mention policies **E3**, **E15** and **E23** of the **Finalised St Andrews and East Fife Local Plan**. **Policy E3** requires new development to "include measures to promote, enhance and add to biodiversity." **Policy E15** requires development in the countryside to be of a scale and nature compatible with surrounding uses and will result in an overall enhancement of environmental quality. **Policy E23** requires developers to show a net benefit to biodiversity and how damage to biodiversity will be minimised and mitigated. These four policies provide additional grounds for refusal of this application.

#### **DRIVER DISTRACTION / ROAD SAFETY**

70. The C30 minor road traversing Clatto Hill would pass approximately 600 metres from the turbine site at the nearest point. It is a very narrow road that requires even medium sized cars to slow down to pass in opposite directions over most of its length. It is rarely gritted in winter and it is quite usual for several vehicles every year to go



off the road in wet or icy conditions. This winding road, with many blind summits or bends along its length, carries local traffic, services visiting local people and farms including large animal and feed transporters, and visitors including those for recreation as well as being used as a travel-to-work shortcut. In addition, the road is in frequent use by horse riders.

71. The **Supplementary Planning Guidance – Wind Energy** (paragraph 3.13) recognises that turbine siting may cause distraction for road users and the possibility requires investigation. The applicant's ES confines any consideration of this matter to main roads, completely ignoring any issues on the C30.

72. **Spatial Planning Advice Note SP12/09** recognises driver distraction and defines it in terms of sudden unexpected features coming into view. Avoidance of sudden distraction, the Note explains, is ensuring that obstacles can be seen from some way off. A survey carried out by our Group demonstrates that this is impossible on this road.

73. Our Group's survey of the C30 (6) covered both directions of travel and produced a detailed account listing the locations where the turbines would come into view quite suddenly, with high risk of driver distraction. We stress that what would suddenly come into view would be moving turbines or parts of turbines that appear overwhelming, large and intimidating. There are 8 such locations. The local topography makes it impossible to avoid the distractions, short of a major realignment and widening of the road, not something proposed by the applicant.

74. Our conclusion is that the proposal creates, on a road with more than its share of driving challenges already, road safety problems for which no proposals have been made in mitigation. We submit that this is a material consideration in this application.

## **TOURISM**

75. Tourism is a major contributor to the Fife economy and Fife Council has set a target for a 20% (£51m) increase in revenues by 2020. The revenues and employment (9% of the Fife work force) from tourism is concentrated in East Fife. It is well understood that the quality and character of East Fife's landscape is the driving force in attracting visitors to the Kingdom. Anything which has an adverse impact on the landscape can therefore be detrimental to tourism's prospects for the future. A report for the Scottish Government by **The Moffat Centre for Travel and Tourism (Glasgow Caledonian University)** in 2008 highlighted that 30% of tourists to Scotland did not want views of wind farms and the presence of wind farms has a negative impact on revenue and thus employment.

76. For the most part, Fife's landscape is gently rolling countryside. The all-round prominence and visibility of Clatto Hill has been demonstrated by the applicant's ZTV. It is also evident that most locations in Fife chosen for wind farms would also have these features – there are no hiding places. Our Group does not contend that this proposal on its own would have a Fife-wide impact. But were it to become one of several sites like it in Fife, the effect would be that wind farms would be seen much of the time by visitors approaching and passing through by rail, car or bicycle. We consider that this would alter visitors' perception of the landscape, seriously diminishing the joy experienced and negating all attempts to increase visitor numbers.

77. Some contend that wind farms can attract visitors. This may be so for some people but the opposite is true for many and in any case, the novelty value has worn off by the presence of many wind farms in Scotland already.

78. Clatto Hill is seen from all the tourist routes coming into Fife. Designated cycle routes and walking routes come close to or go through the area. The area is featured on the Fife Direct cycle route website, the Sustrans UK website supported by the Scottish government which promotes walking and cycling and Cycle-route.com. The attraction of visitors to Clatto Hill and its surroundings would be diminished. By contrast, with new locations required to attract

increasing visitor numbers, Clatto Hill offers real potential. The reasons are covered in the section above on Access, Recreation and Health.

79. In this fragile economy anything that has a negative impact on tourism in East Fife should not be approved.

## **RENEWABLE ENERGY STRATEGY**

80. Backed by a world lead in the technologies and a huge “raw” resource, the **Scottish Government’s Climate Change Delivery Plan (7)** (para. 2.3, page 7 and Table 2, page 13) sets the aim of *“a largely decarbonised electricity generation sector by 2030.”* The **Plan** explains that this aim requires extensive development of offshore wind, wave and tide power and carbon sequestration and storage at fossil fuel power stations. The **Plan** (para.3.19, page 17) also states, referring to the 2011 and 2020 targets, that, *“current activity suggests that these targets will be met comfortably.”*

81. The Scottish Government’s assessment of the renewable generation potential of Scotland is some 60,000 megawatts (MW) (para.3.19, page 17). To meet current demand requires a capacity of around 16,000 MW. The potential far outstrips the need, even taking account of the Scottish Government’s ambitions for Scotland to be a substantial exporter of electricity. The limit of wind and wave power to contribute to the mix stems from its intermittency. Hence the need for tide power and continued use of fossil fuels in the mix.

82. In pursuit of those aims, and following the building of the world’s first deep water offshore wind farm in the Moray Firth, the UK’s Crown Estates has released areas of sea for offshore wind development of over 11,000 MW potential capacity. For wave and tide, building on Scotland’s world lead in research and development, the European Marine Energy Centre in Orkney is being used to test commercial scale devices for these means of generation. According to the **RE News Marine Energy Special 2010 (8)**(the renewables industry’s regular news bulletin), at least 14 wave or tide projects will be operating by 2012. No other country in the world is working on the commercialisation of wave and tide at this level. The ROCs used to promote renewable energy activity have been specifically adjusted to promote further wave and tide generation activity. According to the **Marine Energy Road Map (9)** between 500 MW and 2,000 MW of wave and tide power will be in operation by 2020. Recent work by the Scottish Government’s Marine Energy Group suggests 2,000 MW is feasible. The potential of wave and tide extends to over 20,000 MW.

83. In pursuit of carbon capture and storage, over 200 years worth of storage capacity has been identified in saline aquifers in the North Sea off Scotland, with piping directly to them from power stations being the favoured transport method. Scottish Power is benefiting from a UK Government grant to develop carbon capture technology. Building on the prototype already running, Scottish Power expects to have carbon sequestration operating in one of its four 600 MW units at Longannet by 2014. Full commercialisation is expected to take somewhat longer. With the knowledge in the Scottish universities and industry, the experience of working in the marine environment with oil, the storage capacity of the North Sea, the Scottish Government believes Scotland is well placed to take the lead in developing and commercialising carbon capture and storage. With 23,000 coal fired power stations world wide, the need for retro-fitted carbon capture and sequestration is evident and a major export opportunity. Close to home, recent announcements about practical projects to develop underground coal gasification (UCG) of the coal seams under the Firth of Forth will require carbon capture and storage to make this a green option. The eventual UCG potential under the Forth is over 1,000 MW.

84. The Scottish Government sees the development of low carbon electricity generation in Scotland and in Scottish waters as a huge opportunity to boost the Scottish economy and build exports.

85. With the interim renewable electricity generation targets expected to be exceeded, the scale of Scotland’s renewable energy potential, and very large scale industrial developments underway to meet low carbon electricity

generation needs in the future both for home demand and export, there is no overriding need to site onshore wind projects where serious adverse impacts would be felt. The **Renewables Action Plan (10)** (page 77) sees any further development of onshore wind “where they are environmentally acceptable”, not locations like Clatto Hill!

## COMMUNITY CONSULTATION

86. The Scottish Government’s **Renewable Energy Action Plan (8)** (page 77) describes the ambition of “*maximising community engagement with onshore wind projects.*” **PAN 81** also highlights the need for pre-planning application consultation with local communities. In this proposal, the developer has not engaged meaningfully with the local community in the development of proposals. There is clearly no appetite at Scottish Government level for local conflicts about wind farm proposals in inappropriate locations like many we have seen in the last few years. It appears that the developer in this case has not noticed this.

## 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.

Ample policy support has been cited for a refusal of this application. CLPG therefore urges the Council to refuse the planning application from West Coast Energy.

Greg Brown, chair

On behalf of Clatto Landscape Protection Group

### **Note on CLPG Visualisations**

*The guidelines issued by Highland Council have been followed in producing the visualisations in this document. There are many general difficulties and limitations relating to preparation, application and interpretation of visuals which attempt to predict the effects on landscape of windfarm proposals. Recognising this, it is important to state the purpose of visuals. The purpose of the visuals included in this document is to illustrate accompanying text. In order to*

*make illustration of points clear in the limitations imposed by A4 page size, images may have been cropped and/or scaled.*

*The CLPG visuals do indicate worrying problems related to the visual effect of the proposal considered. However, we are not attempting to provide an alternative set of visualisations to those in the West Coast Energy L&VA. The task of supplying more appropriate material for consideration, in the light of identified problems, should fall to those who prepared the L&VA or better still have a genuinely impartial L&VA carried out ..*

## REFERENCES

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- (3) Newspaper cutting from “L’Independant” (in French), 6 March 2010
- (4) Visualisation Standards for Wind Energy Developments, Highland Council, January 2010
- (5) Siting and Designing Windfarms in the Landscape, Scottish Natural Heritage, December 2009
- (6) Road Safety/Driver Distraction Issues in connection with 2 proposed wind farms on Clatto Hill, CLPG, August 2010.
- (7) Climate Change Delivery Plan – Meeting Scotland’s Statutory Climate Change Targets, The Scottish Government, June 2009
- (8) RE News Marine Energy Special 2010, RE News Limited, 2010
- (9) Marine Energy Road Map, FREDS (the Scottish Government’s renewable energy forum with industry and academia), 2009
- (10) Renewables Action Plan, Scottish Government, Renewable Energy Division, June 2009