

Blairadam & Outh Muir Wind Farms

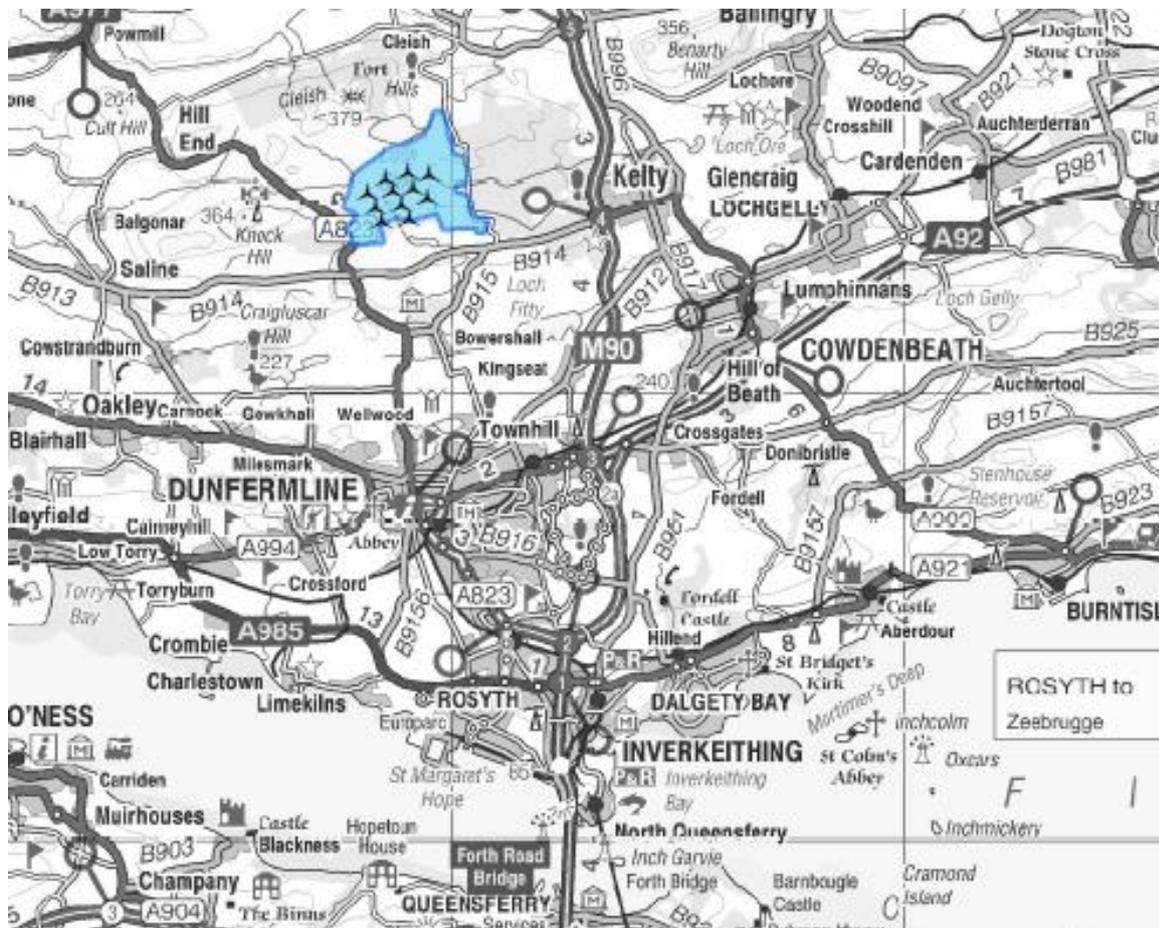
SPOT Fife is a group of West Fife residents who came together because of a concern about high numbers of inappropriate wind farm applications in our local area. We aren't against all wind turbines and only object to applications which have a significant detrimental impact, particularly on communities and the landscape.

Plans have been submitted for two adjacent, but separate wind farms:

- Blairadam Forest 11 x 115m turbines – Partnership for Renewables (PfR) on behalf of Forestry Commission Scotland, planning ref: 14/00008/EIA.
- Cleish Hills, Outh Muir, by Knockhill Racing Circuit 5 x 110m turbines – REG Windpower, planning ref: 13/01898/EIA.

This document provides some information on what factors are considered when determining wind farm applications, why the sites are unsuitable, some background on why there are so many wind farm applications at the moment and information about the impact on and benefits to communities.

Map Of Sites – Blairadam shown in blue, Outh Muir in red



Factors considered when determining wind farm applications

Wind farm applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. Fife Council agreed new Guidance on Wind Energy in June 2013 which shows where turbines are and are not able to be accommodated. Areas requiring significant protection and areas with constraints on wind energy development have been identified and

excluded from the area of search, these constraints include a 2km buffer zone from settlements and designated areas such as Local Landscape Areas (LLAs). The Dunfermline & West Fife Local Plan and Scottish Planning Policy are also pertinent.

The key factors these policies consider when determining a wind farm application are:

- Impact on communities
- Impact on the landscape
- Historic environment
- Areas designated for their regional and local natural heritage value
- Ecology including birds, bats, water, peat
- Aviation, defence and broadcasting installations
- Tourism and recreational interests

Fife Council Guidance deems the sites at Blairadam and Outh as having no capacity for turbines and state the area should be afforded significant protection and not be developed for wind energy.

Reasons the sites are unsuitable

The Cleish Hills Upland area has no capacity for large turbines due to:

- The high quality of the landscape - it's a designated Local Landscape Area also Fife Landscape Character Assessment specifically states Outh Muir should remain undeveloped as should the undeveloped areas of the Cleish Hills, i.e. Blairadam Forest
- High visibility of the area, due to the prominent upland position the site is visible for over 30km forming an important backdrop to Fife in views from the south. This high visibility is illustrated by the Blairadam developer's Zone of Theoretical Visibility map (ZTV) which shows the cumulative visibility of Blairadam and Outh Muir developments, Appendix 1
- Detrimental impact on the historic skyline of Dunfermline
- The area is extensively enjoyed for recreation including walking, fishing, cycling, horse-riding and photography, there's an estimated 40,000 visitors to Blairadam Forest each year. The Blairadam turbines will create shadow flicker across McLennan International Dressage's Equestrian Centre and Knockhill Racing Circuit have objected to the Outh Muir turbines due to safety concerns
- There are many European protected species on the sites including bats, birds, otters, red squirrel, pine martens, curlew, osprey, pink-footed geese and peregrine falcon
- There are three SSSIs on the sites, designated for the blanket bog this is a natural store of CO2 that's released when disturbed. This peat will be further damaged by access roads and grid connections with over 6 miles of overhead or underground cables to connect in Dunfermline
- Impact on the community – the nearest dwellings are only 600m away (Outh Muir) and 720m (Blairadam) and will be visually dominated by the turbines as well as experiencing noise levels above recommended guidelines and shadow flicker
- An application for a single 67m turbine was refused on appeal in 2011 on a site less than 2km away from these proposed wind farms. In comparison to the proposed wind farms, this one turbine was far smaller, sited on lower ground, less visible, further away from the nearest dwellings, sited outside the designated LLA and in the less sensitive Cleish Foothills area which is afforded less protection than the Cleish Uplands area. Whilst each application must be judged on its own merits, this decision would indicate that refusal for planning permission for both applications would be likely to be upheld at appeal
- Perth & Kinross Council have objected to multiple applications for smaller wind turbines in the Cleish Hills, mainly due to the significant impact on the landscape. Most relevant examples include 6 x 25m turbines at Nivingston Craigs and on 15th January 2014 2 x 35m turbines at Fossoway

What's driving the demand for wind turbines?

With the sites so clearly unsuitable and Fife Council policies stating this so clearly, there must be good reason why two developers are planning wind farms here, one of which would be the biggest wind farm in Fife, bigger in fact than Fife Council's planning guidance says could be accommodated anywhere in Fife, even the areas identified as being suitable for large wind turbines.

Wind turbines have been around for years, the ones at Soutra in the Borders were built in 2002, the reason we're seeing so many applications now is because of the introduction in 2009 of FITs and ROCs, subsidies paid to developers via our electricity bills for producing renewable energy.

Local authorities issue guidance on areas where turbines are and are not suitable, however what happens is bottom up planning driven by individual landowners wanting to benefit from subsidies. Having only the land they own available to them, they submit applications whether the site is suitable or not. It's a case of trying to make it fit. Many developers have a scattergun approach, if they submit enough applications some will get approved.

Who are the developers and why are they targeting this site?

Outh Muir is owned by a global investment company, CP Holdings and have previously had an application to open cast the site turned down due to the environmental impact. The developers, REG Windpower, a Jersey based company, work on behalf of CP Holdings and have engaged a PR company as is common with developers, to ensure they do the best job they can at making the wind farm seem desirable.

The Blairadam developer, PFR, is working on behalf of Forestry Commission Scotland (FCS), a public sector body whose mission statement is, 'to protect and expand Scotland's forests and woodlands and increase their value to society and the environment.' FCS appointed PFR to investigate and deliver wind energy projects in the Borders and central belt.

PFR have considered sites at Devilla Forest, Cardenden, Dean Plantation and Carnock but Blairadam is the first site to have progressed this far.

As PFR are limited to finding suitable FCS sites in the central belt, as one of their two regions, there are many constraints on development in this area, not least due to the high population. So to them Blairadam represents the best of a bad bunch of sites, rather than a suitable site. It's interesting that the Blairadam site has been contained within Fife's boundaries when the FCS site also covers Perth & Kinross. Many developers consider Fife a soft touch in the hope communities will be swayed by the financial benefits on offer, many having received payment in the past from coal mining. Also, there have been examples in the past where wind energy developments have been approved contrary to Fife Council guidance whereas P&K council have already refused many turbine applications in the Cleish Hills due the detrimental impact on this important landscape.

Forests are for trees and wild life, and for people to enjoy. Wind farms are industrial structures. Their construction and operation will require many trees to be felled. They will drive out wild life. They will ruin people's enjoyment of the forest environment. Wind farms and forests don't mix.

When David Cameron wanted to sell off forests in England, there was a national outcry and he was forced to abandon his plans. Yet in Scotland there has been no public debate about whether we want to see our forests industrialised or handed over to private wind developers. There will be an outcry once all the turbines are up but by then it will be too late.

Scottish Wildlife Trust conducted a straw poll search for the number of wind turbine applications received by four councils for the two year period 01/02/10 to 01/02/12 for turbines over 15m. The results show that Fife Council has had 138 applications, P&K - 58, East Lothian - 40, Stirling - 29. Stirlingshire covers a larger land area than Fife and has a smaller population, P&K is considerably larger than Fife, only East Lothian is smaller.

If any large turbines are approved in the Cleish Hills Upland area it's likely that more applications will follow and they are more likely to be approved. This has been seen across the UK including at Little Raith where consent was given for 9 x 100m turbines, the developer subsequently submitted a new application to increase the height to 126m and they now wish to extend the wind farm by adding a further 6 turbines. Further applications in the area proliferated including 2 x 100m turbines at Mossmorran which again, after gaining consent have submitted an application to increase the height to 125m, although this height increase was refused due to air safety concerns, 1 x 100m turbine at Goathill Quarry and 3 x 100m turbines at Clentrie.

An article from ReNews, the renewable industry's trade magazine, explains why developers are moving away from submitting new applications for wind farms as almost all the suitable sites have been taken up, they now focus their efforts on expanding existing wind farms and replacing existing turbines with larger ones because it's far easier to gain planning consent as the area is already considered spoiled. Indeed the article upholds Little Raith as an example of how cultivating relationships with planners are crucial to the wind industry. Already the Blairadam application contains an email from the planner to the developer stating, 'I have validated the application but technically should not have done until the location plan is submitted. Accordingly if you can action this asap it would be much appreciated.' A minor issue in this instance but indicative of the culture of developers courting planners whilst those most affected by the application have little say or are indeed unaware of plans until it is too late.

It is apparent that Blairadam in particular has considerable room for expanding the site in future. Both developers scoped the projects at 130m but have now reduced the heights to 115m and reduced the number of turbines to make the schemes less controversial, Blairadam was originally planned to have 23 turbines at 130m. If approved, they too are likely to apply to increase the height and / or number of turbines. REG Windpower have a track record of submitting further applications for their sites after approval, requesting more and higher turbines which are then harder to refuse. They have a strong history of submitting plans in highly unsuitable and controversial areas such as an AONB in the Isle of Wight and protected areas of the Lake District and as a result have had numerous applications refused on appeal due to the unsuitability of the location.

Community benefits and impacts

A developer typically earns, for a single 2.5MW turbine, around £300,000 per year for 20 years in subsidies, a guaranteed payment paid for by us through our electricity bills. For these 16 turbines that equates to £4.8million pa, £96million over 20 years. P&R have said they will recoup the costs of Blairadam in just 3 years. The landowner is given around 5-10% of this for leasing their land, developers usually offer a community benefit payment of around 1-5%.

Financial community benefits are not a material consideration when determining a planning application. However, if both applications were approved and based on what the developers are currently saying, this is what affected communities may expect to receive:

Both applicants indicate they will pay £5,000 per MW installed. The 5 x 2.5MW turbines at Outh = 12.5MW x £5,000 = £62,500 pa and the 11 x 2.05MW turbines at Blairadam = 22.5MW x £5,000 = £112,750. Total from both developments is £175,250 pa. This will be divided across numerous

areas and will need to be decided post approval by a group set up to manage any funds. This is where the communities start to become divided, who is worst affected? How is the money apportioned? Which is the worthiest cause? Which groups are eligible to claim? How many community councils? Probably Kelty, Saline, Townhill, Cleish, Powmill, Kinross and Kingseat and maybe others in Dunfermline etc... all will be affected, but say 6 community councils are allocated 1/6 of £175,250 that's £29,208 pa each. The population of Kelty is 5740 (source Fife Council website) so £29,208 / 5740 = £5.08 per person pa.

A new analysis of government and industry figures released in June 2013 shows that wind turbine owners received £1.2billion in the form of a consumer subsidy last year. They employed 12,000 people, to produce an effective £100,000 subsidy on each job. In Scotland, which has 203 onshore wind farms, more than anywhere else in the UK, just 2,235 people are directly employed to work on them despite an annual subsidy of £344million. That works out at £154,000 subsidy per job.

Objections

To date, the Outh Muir application has attracted over 350 objections from concerned residents. The Blairadam application appeared on the Fife Planning portal in the last week of January 2014 and has not yet been advertised.

Objections for Outh Muir have also been submitted from the following statutory consultees:

- Historic Scotland - due to the significant impact on Dum Glow fort and cairn and their setting, these are scheduled ancient monuments of national importance
- SEPA - because of inadequate assessment of the impacts on the extensive peat bog and concerns about the impact on Groundwater Dependent Terrestrial Ecosystems - there are two SSSIs on the site
- Five Community Councils – Fossoway & District, Cleish & Blairadam, Milnathort, Carnock & Gowkhill and Saline & Steelend
- Edinburgh Airport - due to the effect on their air traffic control radar – the turbines create 'clutter' on the radar so they can't tell whether it's a plane or a turbine leading to significant air safety concerns
- Forestry Commission Scotland (FCS) have objected to Outh Muir due to the felling of ancient woodland, this is despite FCS themselves felling a far larger area for Blairadam wind farm

SNH have raised serious concerns about both applications particularly in relation to the adverse effect on the landscape and visual impact. They confirm the Outh Muir turbines, 'would be widely visible, would draw the viewer's eye and seem to dominate and 'squash' the hills and thus diminish their importance. This is particularly important in views from the south where the Cleish Hills are perceived as the first set of hills on the journey north to the Highlands.'

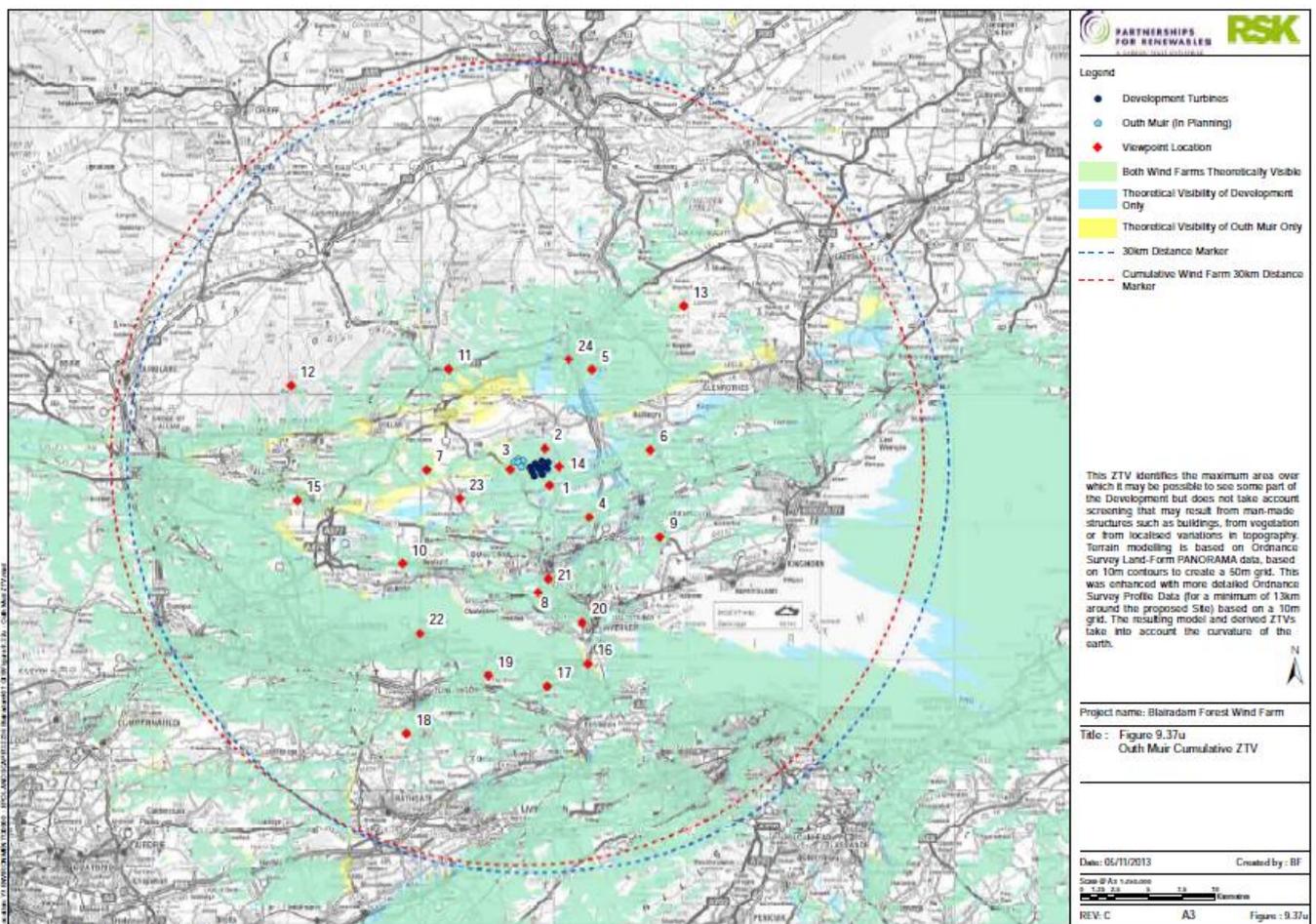
They state the developer has underplayed the impact on views from the south and make a comparison with the Knock Hill masts which are recognised to be prominent and widely visible vertical features in existing views. The Outh Muir turbines are at least twice as tall as the existing masts, have a greater horizontal spread and eye-catching rotating blades, so will be substantially more noticeable than the masts. The turbines will dominate views towards the Cleish Hills and become a new focal point on the northern skyline. SNH note that on the Forth Road Bridge viewpoint the Knock Hill masts are not visible on the developer's submitted photograph yet in reality they are prominent in this view. This means that the Outh Muir turbines would be even more prominent and eye-catching. SNH also raise concerns about views from the north, particularly across the Kinross-shire basin and additionally highlight issues with cumulative impact, in views where the Outh Muir turbines would also be seen in combination with existing small-scale wind developments, they would dominate the smaller schemes and, in combination, would result in a complex picture of

wind turbine development. PfR confirm there would indeed be a significant sequential cumulative impact as well as significant impact as far away as Kingseat at 4.5km.

SNH confirm that the proposals are likely to have a significant effect on the qualifying interests of Loch Leven and Firth of Forth Special Protection Areas (SPAs), i.e. birds and are still in discussion with PfR regarding a cumulative impact assessment for this.

As the sites have already been deemed by Fife Council as not suitable for any wind turbines, of any size, it is vital for Fife that these wind farm applications are refused. If Fife’s largest wind farm is approved in an area afforded, by Fife Council’s own guidance, the greatest protection from turbines of any size or number, it calls into serious question the ability of the Council to create and uphold policy for Fife, particularly given the clarity of these policies regarding the unsuitability of the Cleish Hills area for any kind of wind turbine development.

Appendix 1 – Cumulative ZTV Blairadam and Outh Muir



The green areas show where both Blairadam and Outh Muir wind turbines will be visible from, the blue areas have visibility of Blairadam only and the yellow Outh only.

With the exception of a small area around Cleish, just north of the proposed developments, both sites will be visible across large parts of Clackmannanshire, the Lothians, Kinross-shire and almost all of West Fife.