



**Friends of
the Earth**

**PLANNING APPEAL – WIND FARM ON HILLS OF
TOWIE, KNOCKAN AND McHATTIE’S CAIRN,
DRUMMUIR, KEITH, BANFFSHIRE, MORAY**

Precognition of

Rod Lovie

on behalf of

Moray Friends of the Earth

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c/o 35 Main Street, Newmill, Keith, Banffshire AB55 6UR

1 Qualifications and Experience

- 1.1 My name is Rod Lovie. I hold an MA (Hons) in Countryside and Environmental Management from the University of Aberdeen. I am currently employed by REAP-CSV, a sustainable development charity based in Keith. In the course of my work I have been invited to attend meetings of the Drummuir Windfarm Stakeholders Committee to offer assistance in exploring mechanisms to maximise community benefit from the proposal.
- 1.2 I recently graduated with an HNC in Environmental Justice as part of the *Agents for Environmental Justice* partnership between Friends of the Earth Scotland and Queen Margaret University College. I have been involved in my local Community Association and produced a local community newsletter. I currently hold the post of secretary of Moray Friends of the Earth (MFoE).
- 1.3 I have been asked to submit a precognition for the inquiry into the appeal for a wind farm at Drummuir Estate on behalf of the members of MFoE.

2 Background

- 2.1 The application subject to this appeal is for the erection of a wind farm, associated turbine transformers, building a sub station and minor road widening. The wind farm is to be situated within Drummuir Estate on the hills of Towie, Knockan and McHatties Cairn.

3 Scope of Evidence

- 3.1 My evidence deals with the views of MFoE on three issues:
 - The proposed development in relation to The Moray Council's wind energy policy
 - The location of wind farms within the rural landscape
 - The suitability of Drummuir as a location for wind turbines

4 The Proposed Development in Relation to The Moray Council's Wind Energy Policy

- 4.1 In 2001 The Moray Council produced their Wind Energy Policy Guidance as an addition to the Moray Development Plan. The proposed wind farm is located in an area designated by The Wind Energy Policy Guidance as a *Preferred Search Area* for wind farms. These are areas of land and landscapes which are considered to have the greatest scope for accommodating wind farm development. MFoE believe that as the Wind Energy Policy document was created due to a proposal in the Development Plan, the policy document has to be taken into consideration in relation to the interpretation of the Development Plan.
- 4.2 In producing their Wind Energy Policy Guidance document in 2001 The Moray Council Planning Department were visionary in their approach and perhaps showed a model which other Councils could adopt. Such forward thinking enabled a strategic overview of wind energy development for the area to be agreed and was a useful document for both communities and developers.
- 4.3 It is unfortunate that The Moray Council Development Control have been less visionary in their approach to this application and have chosen to ignore the Wind Energy Policy Guidance document. It is our impression that this has had the effect of invalidating the community consultation carried out to produce the document and consigned it to the shelf to be ignored by decision makers.

5 The Location of Wind Farms within the Rural Landscape

- 5.1 In reaching their conclusion to decline planning permission for the development The Moray Council stated that:
- "..it (the wind farm) would result in an unacceptably intrusive, dominant and overbearing man made feature in an open and exposed area of attractive rural landscape which would be detrimental to the appearance and character of the landscape"*
- 5.3 This implies not only that the landscape around Drummuir is inappropriate for a wind farm, but that any area of open rural landscape is also unsuitable. The Moray Council have already used the same wording to refuse planning permission to proposed wind farms at Aultmore and Clashindarroch. MFoE are concerned that this perception over appearance is being used as a blanket excuse to prevent the development of any further wind farms in the Moray area no matter where they are located.
- 5.4 It is not unreasonable to expect turbines to be visible in the working countryside. PAN 45 states that:
- "Given the Scottish Ministers' commitment to addressing the important issue of climate change and the contribution expected from renewable energy developments, particularly wind farms, it is important for society at large to accept them as a feature of many areas of Scotland for the foreseeable future."*
- The Moray Council stance seems to be contrary to this.

- 5.5 As there are only a limited number of brown-field sites available, and to comply with the Scottish Executive's renewable energy targets, a decision needs to be taken on where in the countryside turbines should go. If Drummuir, a working landscape, is unsuitable then this implies that turbines should go to more remote, undeveloped locations. This will put pressure on a far more precious resource and should be resisted.

6 The Suitability of Drummuir as a Location for Wind Turbines

- 6.1 FoE do not support every wind farm development but do support ones which are of a suitable scale in an appropriate site. MFoE believe that the area around Drummuir is a suitable location for wind turbines. It is not an Area of Great Landscape Value or has any environmental designations attached to it. It is an area which The Moray Council have designated as a preferred search area for wind farms. The area has high levels of wind, is outside MOD training flightpaths and is an area of rolling hills in a working landscape. Furthermore the problems of cumulative impact in this area are unlikely to be realised as the Keith to Dufftown road leads to the newly created Cairngorm National Park and it is unlikely that further wind farms will be created along it.
- 6.2 The application must be compared against Policy *L/ED10 Renewable Energy Proposals* as this is the most appropriate policy to the development. MFoE believe that, for the reasons given above, this policy is not contravened in the case of the Drummuir development. MFoE also believe that it is the duty of The Moray Council to act proactively to encourage onshore wind farms as indicated in the Development Plan.

7 Conclusion

- 7.1 MFoE believe that Moray should take a lead in encouraging renewable energy, including onshore wind farms, as an example of progressive thinking and diversification for rural areas. Like any workplace, the agricultural landscape of Moray is forever changing and the introduction of wind turbines should be seen in this context.
- 7.2 As much of the housing in Moray is located on floodplains, we are more aware than many of the devastating effects which will be brought about by climate change. We must take this opportunity to help the Government meet its commitment made at Kyoto in 1997 to reduce emissions of greenhouse gases by 12.5%. Onshore wind is only one of many technologies which we can use to reduce greenhouse gas emissions and therefore global warming. However it is currently the best developed renewable energy technology which Scotland can utilise to end our dependency on fossil fuel and nuclear energy (*Onshore Wind Farms and Climate Change – Parliamentary Briefing, FoES, 2003*).
- 7.3 Friends of the Earth Scotland believe that in relation to expanding the number of wind farms in Scotland it is important that communities are involved and benefit from the development (*Onshore Wind Farms and Climate Change – Parliamentary Briefing,*

FoES, 2003). MFoE believe that the work by RES to set up a local Stakeholders Committee should be acknowledged as a genuine attempt to involve those most affected by the proposal with its development. Furthermore the proposed local benefits of an environmental fund and footpath links have been developed through working with a number of local organisations – Drummuir 21, the Moray Council Access Officer etc. If Scotland is to realise its potential for clean onshore wind energy it is imperative that imaginative approaches to involve local communities be attempted to maintain a sense of ownership while working within the current funding and planning structures.

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On behalf of Moray Friends of the Earth