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Thursday, 17 May 2007

Dear Sirs,

Public Consultation: Supplementary Planning Guidance – Wind Energy

On behalf of the Protect Rural East Fife group I should like to offer our comments and recommendations on the above as follows;

With regard to the **Forward** section, in the last sentence of the 1st paragraph, it is stated that *"...we can prevent the changes but action has to be taken now"*. We doubt that it is possible to prevent the changes and would suggest wording such as *"...we can attempt to halt the effect of global warming by increasing our commitment to action now"*.

In the 2nd paragraph, 1st sentence, after the word *"lifestyle"*, we suggest adding the words *"and businesses could make changes to their operation"*. In the 3rd sentence, after the word *"Residents"* we suggest adding *"and businesses can be encouraged to employ..."*. At the end of paragraph we suggest adding *"...thereby reducing demand and reliance on fossil fuels"*.

In the 4th paragraph, it is claimed that Fife Council support the use of renewable energy generation and in particular a minimum provision of 10% "in situ" renewable energy generation. Since the 10% target is not yet part of Fife Council's adopted policy and may be subject to change, we suggest deleting reference to the 10% target. A reference to the relevant core plan policy would suffice (i.e. subject to that policy stipulating the minimum target). We would prefer to emphasise the term 'minimum' by adding a sentence such as *"Fife Council will encourage all new development which exceeds the absolute minimum target of renewable energy generation as specified in the core plan policy"*.

With regard to content;

Para 2.2 Refers to the UK government's white paper on energy (2003) and thereby, it is stated that a significant reduction in emissions could be achieved by 2020 by securing energy efficiency in households, industry etc. However, the means by which Fife Council might achieve this is not shown. A reference to supporting guidance on how Fife Council intend to comply with the requirements of the white paper would be useful.

Para 2.4 In this paragraph and elsewhere varying degrees of scope are referred to ranging from considerable through limited to the word scope alone. Since we do not see how these claims can be substantiated, use of the word "scope" alone would be preferred.

Para 3.8 states that "most prospective developers monitor the local wind conditions for some time prior to progressing their proposals". If this is to assess the viability of the site it should be a condition of any planning application that the wind resource has been proven by on site measurement before an application can be submitted.

Para 3.10 states that ice falling from turbine blades is a potential hazard. We recognise that ice falling can be a hazard but as we understand it, the greater danger may be from ice thrown from the rotating blades which can reach a very high speed of rotation. We therefore suggest adding a sentence which requires consideration of the dangers concerning "ice throw" from rotating blades which could be a hazard to people, animals and birds.

Para 3.17 states that "Turbines generate noise at audible frequencies and ultra sound. As we understand it, noise from wind turbines covers a broad spectrum of audible, ultra sound and infrasound frequencies. It is therefore important that consideration is given to the impact this may have on people, animals and birds.

Para 3.19 states that turbines can disrupt TV and radar signals and are considered to create electromagnetic interference. We recognise that disruption to TV signals can be overcome and that radar signal disturbance can affect applications which may be insurmountable. However, we suggest adding a cautionary note for consideration of the possible effect on all other forms of sensitive electronic equipment. For example, where turbines might affect the operation of equipment in hospitals, clinics and businesses. It is also possible that turbines could affect the communications network.

Para 3.21 states that "the Scottish Executive has published research on public attitudes to wind farms in Scotland and evaluated their potential impact on visitor numbers". Apart from a fairly basic comment concerning noise the outcome of this research is not shown. It would be helpful to have a reference / link to research work on this subject and in particular any research / comments / conclusions by statutory agencies. For example, we are aware of consumer research by Visit Scotland on the "*Impact of Wind Farms on Tourism*" and that a 25% of visitors said they would not return to an area where they feel a wind farm had been insensitively sited and where it detracts from the scenery that has been a major reason for their visit. We believe that research work by statutory research agencies should be taken into account in the consideration of any proposal.

Para 5.7 states that Land within settlement boundaries is regarded as outwith the broad area of search for commercial wind farm proposals. We assume the remainder of this paragraph is for our information purposes (if not, we suggest that it be removed). For the sake of clarity, it should be stated that settlement boundaries are as specified in the relevant Local Plan.

Para 5.8 While we are supportive of this statement we feel it should go further and express the view recognising that while there is general support for renewable energy it is not supported in all quarters and so clearly all environmental, sociological and economic matters need to be considered when assessing and determining development proposals.

Para 5.18 It is appropriate to give protection between neighbouring properties and turbines on any commercial scale wind farm and we support a minimum of 1.5Km as proposed in your document

Para 5.31 states that "Areas of historical significance, including scheduled monuments etc....will be excluded from areas of search". We suggest adding the words "and development proposals which would have an adverse effect on the setting of these designations will not be considered".

Para 5.36 states that "turbines that cause disruption to TV signals will only be acceptable provided alternative arrangements are made at no cost to those whose service would be disrupted. We support the need for alternative arrangements in an attempt to prevent disruption and that alternative arrangements must be made at no cost to those whose service would be disrupted. However, the scope of this statement should be widened to be specific about the possible disruption to TV signals and other sensitive electronic equipment. Furthermore, we suggest adding a cautionary note which states that "if it can be shown that disruption has been caused following the installation of turbines and alternative arrangements have been ineffective then further arrangements will be required to overcome the problem. Alternatively, compensatory action will be necessary or possible repositioning of the turbines.

Policy SG1 We feel this policy could be enhanced by including support for wind farms on brown field or contaminated land. Also, we feel that this policy should include a requirement for all proposals to provide detailed information on the required considerations suggested in this supplementary guidance including associated infrastructure required, roads, grid connections and power line gantries, impact during construction and operational phases of the development, including visual impact, noise and electrical interference issues and provisions for the decommissioning and restoration of the site etc. All applications for commercial scale turbines should be subject to the regulatory requirements of an EIA (Environmental Impact Assessment) and supported by an EIS (Environmental Impact Statement) incorporating detailed information on all the above.

Background Papers

Detailed reference to papers would be helpful, including a note of appropriate website and postal addresses so that it is possible to access the relevant paper.

Links between Draft Supplementary Planning Guidance and Core Local Plan Policies

It would be helpful if this section could be brought forward, in front of the Background Paper section, to highlight the importance of these essential links and to provide the primary source of reference for policy and supporting information.

It may also be useful for users of the Supplementary Planning Guidance if they were able to cross reference statements in the text of the guidance to relevant policy or background documents.

Finally, we should like to say that we appreciate the opportunity to comment and hope these comments are helpful.

Yours sincerely

Chair of PREF
Protect Rural East Fife Group