

APPENDIX 6

Summary of Objections/Representations with comments

Appendix 6A

List of parties making objections/representations against original proposal, summary of issues raised with planning officer comment.

Appendix 6B

Applicants response to original objections/representations

Appendix 6C

List of parties making objections/representations against amended proposals, summary of issues raised with planning officer comment

Appendix 6D

Applicants response to objections/representations on amended proposals

Appendix 6E

Summary of letters in support of proposal

APPENDIX 6A

List of parties making objections/representations
against original proposal, summary of issues
raised with planning officer comment

Objections/representations to the original application were received from;

- Malcolm A Hodgson, no address given
- Ms Carol A Whitehead, Tom-Na-Cruinnan, Botriphnie, Keith AB55 5JR
- Mr David Whitehead, Tom-Na-Cruinnan, Botriphnie, Keith AB55 5JR
- S Wright, Loanend, Gartly, By Huntly AB54 4SB
- Mr And Mrs P S Metcalfe, Duaig Loch Avich Taynuilt, Argyll PA35 1HJ
- Mr Regan Walters, Mains Of Auchindachy, By Keith AB55 5HT
- Mr Richard Hammock, Culdrain House, Gartly, Aberdeenshire AB54 4PY
- Mr Peter Hodgson, 2 North Liddle Street, Newcastleton, Roxburghshire TD9 0RJ
- Dr John R Etherington, Parc-y-Bont, Lhanhowell Solva Haverfordwest, Pembrokeshire SA62 6XX
- Mr James B Duffus, Lyndene, Deveron Road, Huntly AB54 8DU
- Dr J L Thorogood, Gadie House Leslie, Inch AB52 6NT
- Mr S Oliver, Bluefolds Highland Holiday Cottages, Folds Cottage, Glenlivet, Ballindalloch AB37 9DS
- Isobel R Card FRCP, FRCPsych, East Brae Of Scurdargue, Rhynie, Huntly AB54 4HG
- Mr J T O'Connell, Larchwood Cottage, Auchindachy, Keith AB55 5HX
- Simon Jacyna And Susan Jacyna, Auchanacie Schoolhouse, Keith, Banffshire AB55 5QE
- Mrs M O'Connell, Larchwood Cottage, Auchindachy, Keith AB55 5HX
- Dr Rhona Newman And Julian Newman, Bogancloch Lodge, Clashindarroch Forest, Huntly AB54 4HN
- Mrs Audrey Miller, C/o Raeburn Christie Solicitors And Estate Agents, 399 Union Street, Aberdeen AB11 6BX
- Dr P Victoria Spencer, Drumnoth, Brae Of Scurdargue, Rhynie, Huntly, Aberdeenshire
- Mr And Mrs Worthington, Shieltmuir, Drybridge, By Buckie, Banffshire AB56 5JD
- Owner/Occupier, Auchlunkart House, Mulben, By Keith, Banffshire AB55 6XL
- J Glass, Miltoyn, Lower Cabrach, Huntly, AB54 4EU Aberdeenshire
- Mrs N Glass, 5 Middleton Park, Brechin, Angus
- Mr And Mrs P Crotty, Lilburn, Inchberry, Orton, Fochabers Moray
- Mrs J E Owen, Calusk, Mulben, Near Keith, Banffshire AB55 6YX
- D L Owen, Curlusk, Mulben, Near Keith, Banffshire AB55 6YX
- Mr Bill Glass, Miltoyn, Lower Cabrach, Huntly, Aberdeenshire AB54 4EU
- H Meston, 52 Connor Street, Peebles, Borders EH45 8EZ
- Glass, 52 Connor Street, Peebles, Borders EH45 8EZ
- Mr And Mrs Wethrill, Bogincur House, Orton, Fochabers, Moray IV32 7QD
- Mr R J Pitt, Hillockhead, Huntly, Aberdeenshire AB54 6XQ
- E A Andrews, Parkmore Holiday Cottages, Dufftown, Keith, Moray AB55 4DN
- Jennifer Fraser, Hall House, Drummuir, Banffshire AB55 5JF
- Linda Greig, On Behalf Of R Peter W Millar, Mains Of Orton, By Fochabers, Moray IV32 7QE
- Ann Metzler-Trembath, Charlesville, Stotfield Road, Lossiemouth, Moray IV31 6QP

- Mr Alex Metzler-Trembath, Charlesville, Stotfield Road, Lossiemouth, Moray IV31 6QP
- Mr R M Stewart, Bonavista, Commerce Street, Lossiemouth, Moray IV31 6BW
- B Stoul, no address given
- J Hattan, no address given
- Glendonald Farming Partnership, New Merdrum, Rhynie, Huntly, Aberdeenshire AB54 4HG
- Glenda George, Lower Chanie, Craigellachie AB38 9RL
- Mr Robert Ince, Lower Chanie, Craigellachie AB38 9RL
- Mr Bob Graham, Craigsview, Inchberry, Orton, Moray IV32 7QH
- Mr Michael J Baird, Dornoch Road, Bonar Bridge, Ardgay, Sutherland IV24 3EB
- Frances Higgins, Cranna House, Mulben, Keith, Banffshire AB55 6XL
- Mr Mike Higgins, Cranna House, Mulben, Keith, Banffshire AB55 6XL
- Mrs J Petrie, Hollybank, Mulben, Keith AB55 6XP
- J Smith, Berrybauds, Clochan, Buckie, Banffshire AB56 5HX
- Mrs V And Mr R Brook, Mr P And Mrs J Nattress, 1 Parkland Grove, Mowden Park, Darlington Co Durham DL3 9DH
- L Collins, Parkhead Drummuir, Keith, Banffshire AB55 5PQ
- P Fielding, 7 The Avenue, Shaw, Oldham, Lancs OL2 7HE
- S D Mathers, The Stable, Croftmore, Mulben, Keith
- W J C Henderson, 11 Inverleith Place, Edinburgh EH3 5QE
- Mrs B J Laurenson, Shawlands, 19 Hamilton Drive, Elgin Moray
- Mr C Lancaster, Stripeside Soft Fruit, Stripeside Croft, Grange, Keith AB55 6LH
- Mr E A And Mrs V C Morrison, Heath Cottage, Mulben, Keith, Banffshire AB55 6YH
- Mr Paul Barwell, Quarry Pines, Craigellachie, Banffshire AB38 9RL
- Mr Colin Poppy, Leanach House, Drummuir, Keith AB55 5PS
- Judith And Raymond Preston, 44 Irving Road, Solihull, West Midlands, B92 9DG
- Ms Catriona Keith, Secretary, Scottish Endurance Riding Club, 15 Nellfield Place, Aberdeen AB10 6DE
- Boharm Community Association, Birch Brae, Wood of Blackhillock, Mulben, Keith AB55 6XL
- Mrs Elizabeth Mead, Tombreck Farm, Carron, Aberlour, Banffshire AB38 7QP
- Lea Allen, Newfield, Craigellachie, Banffshire AB38 9RL
- Jane MacPherson, Shandston, Mulben, Keith AB55 6YD
- Mr Michael H Lobban, Reirahmory, Quarryhead, Auchindachy, Keith Banffshire
- Ms Annette Lobban, Reirahmory, Quarryhead, Auchindachy, Keith Banffshire
- Mr Rory Lobban, Reirahmory, Quarryhead, Auchindachy, Keith Banffshire
- Dr Janet Trythall, Seaview, Covesea, Duffus, Elgin Moray
- Strathisla Community Council, Deanshaugh Croft, Mulben Keith
- Simon Jacyna, Auchanacie Schoolhouse, Keith, Banffshire AB55 5QE
- Mrs J Wells, Larch Wood Gardens, Auchindachy, Keith, Banffshire AB55 5HX
- Mrs L Watt, Larch Wood Gardens, Auchindachy, Keith, Banffshire AB55 5HX
- Miss A Wells, Larch Wood Gardens, Auchindachy, Keith, Banffshire AB55 5HX
- Mr D E C Wells, Larch Wood Gardens, Auchindachy, Keith, Banffshire AB55 5HX
- Mr Mike Fetter, Mains of Auchindachy, Keith, Banffshire AB55 5HT
- Mrs Sheila Fetter, Mains of Auchindachy, Keith, Banffshire AB55 5HT

- Mr David Bunch, Mains of Auchindachy Cottage, Keith, Banffshire
- R Bunch, Mains of Auchindachy Cottage, Keith, Banffshire
- Ms Sally Hancock, 1 Towemore Cottages, Drummuir, Keith, Banffshire AB55 5JA
- Dr Janet Trythall, Seaview, Covesea, Duffus, Elgin Moray
- D D Dillon, Mill of Towie, Drummuir, Keith, Banffshire AB55 5QD
- Ms Vivien Dillon, Mill of Towie, Drummuir, Keith, Banffshire AB55 5QD
- Miss Eilidh Dillon, Mill of Towie, Drummuir, Keith, Banffshire AB55 5QD
- Miss Mairi Dillon, Mill of Towie, Drummuir, Keith, Banffshire AB55 5QD
- Mr Steve Smith, Auchindachy House, Auchindachy, Keith, Banffshire AB55 5HX
- Mrs J Ricketts, Auchindachy Croft, Auchindachy, Keith, Banffshire AB55 5HY
- Ms Susan M Jacyna, Auchindachy Schoolhouse, Keith, Banffshire AB55 5QE
- Dr Neil Tilston, Mains of Auchindachy, Keith, Banffshire AB55 5HX
- Regan Walters, Mains of Auchindachy, Keith, Banffshire AB55 5HX
- Mr Lewis, The Old Manse, The Square, Archiestown, Aberlour AB38 7QX
- Miss Jennifer McKenzie, Leanach House, Drummuir, Keith, Banffshire AB55 5PS
- K Playle, Wester Chalder, Keith, Banffshire AB55 5QD
- Mrs Ann Playle, Wester Chalder, Keith, Banffshire AB55 5QD
- Ginette Playle, Mill Cottage, Wester Chalder, Keith, Banffshire AB55 5QD
- Jamie Playle, Mill Cottage, Wester Chalder, Keith, Banffshire AB55 5QD
- Mr Graham Henderson, Tigh an Drochaid, Kilchrenan by Taynuilt, Argyll PA35 1HD
- Mrs Marilyn Henderson, Tigh an Drochaid, Kilchrenan by Taynuilt, Argyll PA35 1HD
- Mr Peter Hodgson, 2 North Liddle Street, Newcastleton TD9 0RJ
- Ms Helen Richardson, Morloch, Waterstein Glendale, Isle of Skye IV55 8WT
- Ms Elizabeth Mann, 26 Millbank Court, Darlington, Co Durham DL3 9PF
- Mr Michael Ryan, The Cottage, Balkeerie, Angus DD8 1ST
- David and Linda McWilliam, Towiemore House, Botriphnie, Keith, Banffshire AB55 5JA
- Baron and Moira Strathdee, Fordston, Glack of Clunymore, Dufftown, Keith AB55 5JA
- Mrs J Rugg, Innesvale, Glack of Clunymore, Dufftown, Keith AB55 5JA
- Mr and Mrs R Third, 5 Westerton Court, Keith, Banffshire AB55 5FA
- Mr Alastair Watt, Coldhome Farm, Keith, Banffshire AB55 5NX
- Ms Agnes Watt, Coldhome Farm, Keith, Banffshire AB55 5NX
- Mrs J Moss, Briggs of Darbreich, Deskford, Banffshire AB55 5YU
- M Wetherill, Bogincur House, Orton, Fochabers Moray IV32 7QD
- Miss J C Willis, Deanshaugh Croft, Mulben, Keith, Banffshire AB56 6YJ
- W Edwards, Broughnamary, Mulben Keith
- Mr and Mrs Chalmers, Hamewith, Inchberry, Fochabers, Moray IV32 7QD
- Rev Wg. Cdr A L Willis, Deanshaugh Croft, Mulben, Keith, Banffshire AB55 6YJ

The main points raised are as follows;

Contrary to development plan

- Proposal contravenes policies S/ED1, S/ED7, S/ENV1, S/IMP1, L/ED10, L/ED15, L/ENV2, L/IMP2 and L/IMP3
- Contrary to Structure Plan which states Moray has high quality and perhaps unique environment and strategy seeks to safeguard and enhance quality of both its natural and built elements – wind farm is antithesis of this strategy
- Structure Plan acknowledges importance of Moray’s high quality environment as a major asset and theme is reiterated throughout Plan
- Does not comply with Council’s ENV and IMP Policies – not compatible in terms of character, amenity and design and will not integrate sensitively into the environment
- S/ED1
 - the wind farm will adversely affect tourism
 - approach is to target public and private sector resources into towns and established business areas whilst safeguarding the environment and making best use of infrastructure
- S/ED7
 - which encourages smaller scale business development in countryside subject to it being acceptable in terms of infrastructure and environmental considerations
- S/ENV1
 - Wind farm cannot conserve and enhance environmental assets
- L/ED10
 - states proposals for renewable energy must be compatible with policies to safeguard and enhance natural environment – this can only be done by refusing application.
 - also states proposals have to be compatible with tourism – informal conversation with visitors to Dufftown show that the overwhelming majority would not come back to Moray if landscape is altered by proposed development.
 - Wind Farm can not be said to enhance built and natural environment – not compatible with tourism – unacceptable impact in terms of visual intrusion – unacceptable cumulative impact
 - 21 330 ft wind turbines in associated thousand cubic metres of concrete are not compatible with policies to safeguard and enhance built natural environment
 - Developers have not shown that they are in compliance with L/ED10 – ES underestimates landscaping, visual effects of proposal through errors, incomplete analysis and techniques which minimise impact of proposal
 - Electro magnetic interference – developer only refers possible measures to mitigate problem – mitigation is not a resolution – developer cannot say they are not in breach of L/ED10(v)
- L/ED11
 - How will RES restore borrow pits in relation to policy
- L/ED15
 - Wind Farm cannot be designed to reduce its visual impact to anything like acceptable level

- L/ENV2
 - A development of this scale cannot avoid major impact on ecological and biological balance – vast amounts of excavation for roads construction – massive foundations and quarries required
- L/IMP2
 - states that rural developments should integrate sensitively into the environment and Council will pay special regard to landscape impact – this must mean that any decision on erection of 21 330ft high structures must be negative.
 - cannot comply with the requirement to be compatible in terms of character, amenity and design and integrate sensitively into environment
- Benefits are non-existent therefore there is no justification to depart from Local Plan policies.
- Departure from a number of fixed and agreed strategies democratically in place and formed part of the platform on which current Councillors were elected
- Such a huge step outside agreed strategy is not something which should be decided by a few individuals
- Exclusion of areas like Drummur, Paul's Hill and Cairn Uish from S/ENV2/3 policies more for administrative than environmental reasons
- No evidence of examination of indirect effects on setting of scheduled ancient monuments and listed buildings – appears to be no catalogue of such buildings within such study area in ES

Comment

The relationship of the development to policy is dealt with in the report. The application is being recommended for refusal because it does not comply with policy.

Contrary to Moray Council Wind Energy Policy Guidance

- Guidance states
 - Waste is minimised then reused – EU is shortly to bring legislation to limit the amount of waste that can be placed in landfill – some farsighted Councils are already investigating possibility of incineration of waste and clean furnaces to produce electricity.
 - Local needs are met locally – underpins one of the pieces of information available from RES as it hints electricity from Wind Farm will be used in Moray and will be cheaper – Mr. Ray Hunter of RES could not say positively that it would be obtained in Scotland let alone Moray.
 - Access to services is not achieved at the expense of the environment – access to electricity services provided by the Wind Farm will be at the expense of the environment.
 - Health and wellbeing are promoted through pleasant environments – this cannot be said of 21 330ft high structures.
 - Leisure readily available to all – some people will not be able to look out of windows without seeing these structures and will not be able to have window open on a warm night without suffering from noise of turbines
 - Wind Farms commonly consist of 15 – 30 turbines up to 100m in height on prominent hillside locations and important to balance positive effects with

environmental impacts – they have been set on hilltops not hillsides and no positive benefits

- Moray has very high quality environment which must be safeguarded from inappropriate developments – development very inappropriate and site in populated area visible from wide area on relatively unspoilt moorland
 - Local needs are met locally and local traditions and cultural identity valued – development not contributing to any of these – need explanation of benefits Moray will receive
 - Support for Scottish Ministers commitment to renewable energy and positive provision for its development – if Cairn Uish and Paul's Hill go ahead, Moray will exceed the target of 18% of electricity from renewable sources by 2010 many times over
 - Council will commission independent sustainable development audit to assess balance between gains from wind energy and possible adverse effects – when will this independent audit be carried out and will public be allowed to see the results
 - Details should be provided assessing potential disturbance to nearby properties and settlements covering aspects such as shadow flicker, disturbance to TV and acoustic effect --RES claim television reception to east of site is already very poor – look to east of site and TV reception good – typical of developers approach, they have not assessed area or asked opinions how can they provide a balanced view
 - Council consider high quality environment in Moray can accommodate a limited number of wind farms --this development adds to number of wind farms and does not meet guidance – Council does not have the strategy to finding how many wind farms can be accommodated and until it does application cannot be considered – important that only the most suitable sites within the overall physical and socio economic context of area are developed
- Guidance indicates that a statement should be provided to assess how the proposals supports the Council's vision of a sustainable Moray which includes how/where energy production relates to consumption and location for producing wind turbines – proposal would appear to be of benefit to electricity consumers and others outwith Moray and turbine production would appear to be abroad – not clear how proposal supports Council's vision
 - Guidance reiterates need for sustainable development – proposal does not support principle that local needs are met locally, supporting local business and employment

Comment

The wind energy policy guidance identifies preferred search areas on the basis of a mapping exercise involving a number of constraints. The site is in a preferred search area. The guidance is clear that preferred search areas are areas where the Council consider there to be potential to further investigate the feasibility of a wind farm. It does not imply a presumption in favour of granting planning consent within these areas. Detailed landscape issues did not form part of the mapping exercise because they are dealt with through an Environmental Assessment. The application is being recommended for refusal because of its impact on the landscape taking account of the information provided in the Environmental Assessment.

Contravenes national guidance

- SPP1
 - planning system must provide protection from inappropriate development and maintain/enhance quality of natural heritage and built environment – wind farm at Drummuir will not contribute to this
 - effective planning involves community involvement and dialogue – only community involvement has been closed door meetings between parties with a vested interest
 - planning decisions should favour most sustainable option promoting development that safeguards and enhances long term needs of economy, society and environment – when conflicts between objectives inevitably arise decisions should be taken in line with local priorities and needs – wind farm at Drummuir has got very little to do with local priorities or needs
 - social justice requires attention to be paid to need of local communities including those who have little contact with the planning system and are unsure how to get involved – this statement applies to majority of public
 - protecting and enhancing quality of environment is key objective of planning system – environmental justice requires to recognise cumulative impact of environmental disbenefits and ensure people do not live in degraded surroundings – surroundings could hardly be more degraded than having a wind farm in the neighbourhood
 - ill conceived and poorly designed development is not in the public interest as mistakes cannot be easily or cheaply rectified – how is decommissioning enforced when the developer goes broke
 - if the proposal does not accord with the Development Plan it should be refused unless there are material considerations indicating that it should be granted – other than discredited Government targets on renewable energy there are no justifiable material considerations that favour application – Drummuir application is a significant departure from the Local Plan
 - planning decisions should always be made on planning grounds and in the public interest – other than monetary gains for the landowner this application is not in public interest
 - weight given to public concern of the material consideration should be based on the relevance of the planning issues raised – all of the planning issues raised are extremely relevant

- NPPG2
 - requires planning authorities to give priority to job creation and economic development – application does not create any permanent jobs and contributes nothing to economic development
 - requires planning authorities to ensure that business and industrial development does lead to unacceptable damage to environment – application industrial and will lead to unacceptable damage to environment

- NPPG6
 - states local authority should identify sites for wind and other renewable energy developments – not complying with this policy as no evidence can be found of consideration of alternative energy sources other than wind.
 - in direct contravention of para 21 which states development proposals should avoid significant adverse impact on character, quality, integrity and setting of a designated resource
 - para 22 which states that unless at site level there are serious adverse impacts that cannot be mitigated then in relation to the local community developments should not be permitted where they would have a significant long term detrimental impact on amenity of people nearby – impact of 21 330ft turbines cannot be mitigated
 - provides protection to local community from long term detrimental impact of wind farm developments – it states that in relation to local community developments should not be permitted where they would have a significant long term detrimental impact on the amenity of people living nearby where impact cannot be mitigated satisfactorily
 - states that any landscape should be able to accommodate renewable energy developments if they are in appropriate locations and of an appropriate scale and type – proposal is not of an appropriate scale or location and magnitude of change to the landscape is significant and damaging

- NPPG14 and NPPG15
 - Main themes emerging are that environmental quality of natural heritage is a tangible asset upon which future prosperity and sustainability is based – as such protection and enhancement is of great importance – guidance emphasises that protection is not limited to designated areas

- NPPG14
 - on natural heritage the NPPG describes the criteria for assessing development which affects other conservation interests, the role of local biodiversity action plans and the use of a precautionary principle where development threatens to damage natural heritage
 - RES cannot provide evidence that native species, habitats, eco systems, geological, physiological features, natural beauty, amenity of countryside and opportunities for recreation and enjoyment will not be adversely affected

- NPPG15
 - Points out tourism as making major contribution to rural economy – foreigners have already warned local businesses in Speyside that wind farms would adversely affect likelihood of them returning to Moray – £4b comes into the Scottish economy from tourism – any threat to tourism no matter how slight is more justification for refusal
 - Key principle is to protect and where appropriate enhance the countryside and guiding principle for Councils and developers is that the development should benefit local communities socially and environmentally – these two principles would not be upheld by Grampian Planning Consent for wind farm
 - refers to importance of tourism and its contribution to rural economy

Comment

The relationship of national guidance to the development is dealt with in the report.

National guidance flawed

- NPPG6 and PAN45
 - much emphasis on discredited Government targets for renewable energy – paragraph 9 is also inaccurate in that Hydro Schemes count for 15% not the 12% quoted in the UK target for 2010 as 10%
 - Scottish Executive Energy Division has no qualified scientific advisers and takes all its advice from the private sector i.e. developers – PAN45 has been produced with information supplied by developers
 - Scottish Executive documents based on renewable obligation Scotland – recent report by Royal Academy of Engineers commissioned by Energy Minister, Brian Wilson states Government's renewable energy targets are hopelessly unrealistic
 - Government targets for wind generated electricity unrealistic – see report by Royal Academy of Engineering commissioned by Brian Wilson which states that Government's target for renewable energy hopelessly unrealistic
 - Report from Royal Academy of Engineers throws into serious doubt most of advice from Scottish Executive on subject of renewable energy
 - Blind adherence to flawed planning documents no excuse for allowing desecration of only remaining natural asset - countryside
- Royal Academy of Engineering's response to PIU Development Document suggests that a headlong rush into wind power is premature if not potentially dangerous
- Project only made sustainable by levies imposed on electricity bills
- Case for wind power basically flawed and economics do not include financing of all surplus generating capacity required to meet demand when wind is not blowing
- IEE warns of gigantic number of 2 megawatt turbines that would be required to meet Government targets set out in the Energy Review – at least 10,000 will be needed
- If Government finds the subsidy too expensive what will happen – has already happened in Denmark – not only made wind power programme be halted in mid stream but existing installations may prove too expensive to maintain or decommission
- Wind Farms in the US stand idle because of withdrawal of subsidies – developments could end up as white elephants
- Electricity from wind farms currently operate on costs more than twice as much as conventional electricity

Comment

Although there may be differing views about the adequacy of national guidance it is a material consideration as it stands. Changes to National Guidance are a matter for

government. As things stand at present the Government's commitment to renewable energy is clearly set out in NPPG 6 and PAN 45.

Lack of adequate strategy

- Scotland has been lumped in with the rest of the United Kingdom by Westminster Parliament because it was expedient to do so.
- Absence of coherent and realistic energy strategy
- Not a local planning issue – needs to be seen in context of a National Energy Strategy for which Government must seek and need professional advice – debate has not started in any significant way – as proposals based on flawed science all development should be halted until Government have developed a comprehensive Energy Strategy
- Permission should not be granted until Scottish Executive brings forward plans for National Strategy for future of wind farming
- Current flood of wind farm applications needs to be contained and in the guidance and control of Government's Renewable Energy Commission
- More constructive to review application of all forms of renewable energy to enable a forward looking balanced policy.
- Council states that in addition to guidance it is undertaking further research into the potential for other forms of renewable energy in Moray – excellent aim but where is the evidence – lack of research puts into doubt any decisions on wind farms as there can be no integrated strategy until whole picture on renewable energy emerges.
- Development should be considered with a further five wind farms in the area and not dealt with on a piece-meal basis
- Moray should also have policy allowing for determination of which are best sites given that Moray would not wish to have unlimited number of wind farms
- Effects compounded by cumulative impact of other wind farms in Moray and West Aberdeenshire – Council require strategy to consider overall capacity of landscape to accommodate these developments
- Serious flaw in Moray Council's wind energy policy guidance that developers are only called on to consider implications of the proposals in context of other operational sites in the area
- One of six applications and not part of renewable energy strategy
- Already two schemes likely to go through in Moray – careful assessment over a period of time should be made before further schemes are given green light
- Exposes Moray's lack of any plan relating to wind farm development
- Moray needs an overall strategy for development involving alternative sources of energy not piece-meal developments
- Moray does not have a policy framework for wind farm development – this should outline a plan which describes the amount of wind power that Moray aims to generate by what year
- Seems to be no Moray District plan for dealing with wind farms – in absence of detailed plan all applications should be put on hold
- Large number of applications suspicious – is as if on back of first application being granted other wind farm producers are thinking they have an accessible –

perhaps gullible – local council with a very scattered – and possibly naive – rural population

Comment

There are national and local strategies for renewable energy including wind energy. The national approach is set out in NPPG 6 and PAN 45. These are translated into local strategies and policies in the Development Plan and associated Wind Energy Policy Guidance. The cumulative impact of the development has been referred to in the report.

Further Research/Public Inquiry Required

- Independent advice should be sought concerning long term environmental impact these developments may have as well as impact on tourism, house prices and real value of their contribution towards electricity production
- Some form of public inquiry with input of specialised and independent nature is necessary
- Not enough research has been done – out of date technology – inroads have been made into developing offshore wind farms
- Independent sustainable development audit to investigate whole issue should be carried out in accordance with wind energy policy guidance
- More time should be taken in research for renewable energy systems – Professor Bryden of RGU currently at forefront of research in tidal energy field and probably within two years of perfecting system for Pentland Firth which he believes will provide consistent flow of electricity sufficient for 15 million people without excessive intrusion and damage to local environment
- Wind Farms should not be considered until publication of Cumulative Impact Study which SNH is presently working on for Moray
- Two wind farms already accepted in Moray by Council and another one approved at Glens of Foudland – should take opportunity to learn from local experience before approving more
- More time required before public has gained sufficient knowledge to make informed opinion – in meantime application should be rejected
- More consultation needed
- Comprehensive public inquiry required
- Great many individuals in communities against developments so surely there is a need for longer period of public consultation
- Lack of information in time for residents to consider proposals
- Whole industry is moving so fast that a period of no action but much thought and planning is called for.

Comment

If the recommendation to refuse the application is accepted the applicants can appeal and this could result in a public inquiry. At present there is no similar right of appeal for objectors if the application is approved although they could challenge the decision, for example, through judicial review. The application needs to be determined on the basis of existing development plan policy and material considerations. The study referred to by SNH is investigating the landscape potential for wind farm

development in East and North Highland and Moray. Highland and Moray Councils are partners on the steering group. The results of the study are not yet available. Once available the study could be a material consideration but it would not have the same weight as development plan policy or the wind energy policy guidance which have been the subject of public consultation. In any event it is possible for a decision to be made on the application on the basis of existing policies and material considerations.

Environmental Assessment

- EIA supplied by developer
- How can the public be expected to come to terms with EIA supplied by RES in 28 days
- Who checks veracity of information in the EIA
- Sceptical at accuracy of wireline graphics having seen several sites where towers are only 60% of the height
- Independent consultants used by RES have been on their payroll
- Contains many errors, omissions and incorrect deductions – in summary the Environmental Statement understates landscape and visual impacts – understates socio economic disbenefits – overstates socio economic benefits – claims proper public consultation has been carried out
- RES claim that approximately 1 –2% of area of site will be sterilised - this gives margin of error of 100%.
- RES claim introduction of mitigation measures has ensured that there would be no effects on principal sensitive water features – are they not going to be affected in construction phase and in operating phase given that RES did not even know whether 1 or 2% of the site is to be excavated to a depth of 1 - 3½m with concrete blocks 14 – 18m diameter

ES section 1.3 - Rationale for the Project – Need for Greenhouse Gas Reduction

- 1.3.3 – construction projects required to reinforce electricity grids are themselves polluting and damaging to environment – electrical energy dissipated as heat when transporting it over long distance – losing electricity as it is transported along high voltage transmission system is neither economic or good for the environment (offers of gas and electricity markets) – more effective to produce electricity closer to the consumer
- 1.3.4 – RES do not give energy payback time for Drummuir Wind Farm
- Value of 94% recyclable excludes materials in foundations – about 640 tonnes – no intention of recycling foundations – in reality only 28% of materials used in constructing a turbine can be recycled

ES section 1.4 - Government Environmental and Energy Policy

- 1.4.5 – Since Central and Southern England do not appear enthusiastic to have Wind Farms built in their countryside the renewables obligation mechanisms means that Scotland will have wind farms instead and renewables generators such as RES (based in St. Albans) can sell suppliers in England, the ROC is to fulfil their obligation

- When future bilateral agreements are in place with other countries in Europe then Scotland can not only host wind turbines to provide renewable obligations for rest of UK but it can do it for other parts of Europe who don't wish to host renewable energy developments themselves – would appear to many people as if wealthier countries are able to shirk their responsibilities for reducing greenhouse emissions by simply buying a token

ES section 1.5 - Scotland's Renewable Energy Resource

- NPPG6 identifies renewable energy as covering energy flows occurring naturally and repeatedly in environment – contrary to developer's assertion that onshore wind energy is only renewable technology currently economically competitive with conventional supplies Hydro power has long been competitive in the market place
- Electricity generated from wind power is more expensive than from conventional sources. In meantime increasing proportion of wind power used in electricity will increase cost of electricity to consumer – NPPG6 recognises this when it states an aim of achieving 10% of the UK's electricity supply from renewables by 2010 subject to the cost to the consumers being acceptable
- Figures RES quote for onshore wind potential in Scotland is equivalent to 274 wind farms the size of Drummuir or 912 wind farms of a 30% efficiency values applied – present planning guidelines indicate these would need to be concentrated outside designated areas – this would create 2 areas of countryside unspoilt designated areas and the rest – unfortunately for Moray the majority of the area falls into the rest category
- ES section 1.6 - Contribution of the Drummuir Wind Farm
 - adoption of wind energy developments across UK not widespread – specifically concentrated in certain areas and almost entirely absent from others – every part of UK should make their contribution to collective obligations
- ES section 1.7 - Public Attitudes
 - Survey referred to sampled people within 20k of four different Scottish Wind Farms – equivalent of asking people living as far away as New Elgin, Cabrach about Drummuir Wind Farm – one of the wind farms Hagshaw Hill, Lanarkshire located in landscape already degraded by lead workings, another - Windy Standard - in area identified on British Wind Energy Association website as being prone to cloud for up to 60% of the year – only 15% of residents surveyed saw it every day – up to 13% have never seen it and only 4 people within 5 k could see it from their home or garden but 9% experienced one or multiple problems with wind farm – for the Drummuir proposal this would indicate that many thousands of people would experience these problems since several major population centres are within 20k of the proposal
 - 1997 and 1998 Surveys referred to were commissioned by BWEA – Scottish Executive Commission Document on Public Attitudes Towards Wind Farms notes that as much of previous research has been funded by Wind Power Industry, there is scope for accusations of partiality

- ES section 1.9 – Consultations
 - Planning Application was submitted shortly after first real public notification by RES - this does not constitute consultation
 - Local Stakeholder Committee involves group of people who appear primarily to have vested interests
 - Misleading information provided by developer in leaflet distributed to 4000 homes regarding supplying energy for 60% of Moray's households, reduction in CO₂ omissions, legacy free electricity, distortion of photomontage, survey quoted carried out for British Wind Energy Association, contribution through business rights, photograph of man and child in winter by turbines, statements regarding onshore wind being only renewable technology to become economically competitive, avoiding long distance transmission, wind farms can be easily removed

- ES section 4.0 – Landscape and Visual Assessment
 - 4.4.2 (Existing and Proposed Wind Farms Study) – Wind Farm with Planning Consent within 25k at Glens of Foudland
 - 4.4.3 (Strategic Planning Context) – Identification of preferred search areas does not imply presumption in favour of granting planning consent within these areas
 - 4.4.5.2 (Agricultural Foothills) – Omissions in receptors e.g. walkers and cyclists on Craigellachie to Dufftown Spur of Speyside Way, walkers on Dullan Water Walks, users of recreational Keith to Dufftown Railway, users of local Golf courses, Whisky Trail, these types of receptors have high sensitivity to change – table 4.3 should read High for Agricultural Foothills
 - 4.4.5.3 (Coast) – Omissions in receptors e.g. walkers on Speyside Way, connecting footpaths to Garmouth and beyond around Garmouth and Kingston, cyclists on sustrans national cycle network, Moray Firth Wildlife Centre - therefore table 4.3 should read Sensitivity should change as High
 - 4.4.5.5 (Coastal Plain) – Omissions in receptors e.g. walkers and cyclists on Speyside Way and cyclists on Elgin to Lossiemouth Cycle Way
 - 4.5.2.3 (Assessment of Residual Landscape Effects – Agricultural Foothills) – Due to incorrect analysis in 4.4.5.2 effect of Wind Farm on Landscape Character is actually major rather than major/moderate stated in ES
 - 4.5.1.3 (Coast Assessment of Residual Landscape Effects) – Text at odds with table 4.3 – Due to incorrect analysis in Section 4.4.5.3 Sensitivity to Change should be High – also significant part of this landscape type which has a very high concentration of receptors at high sensitivity coinciding with high visibility – effect of wind farm on landscape, character and quality of coast landscape should therefore be considered to be moderate rather than minor as stated in ES
 - AGLV2 and AGLV4 – Residual effects should be moderate/minor not minor as stated – Last sentence in Section 4.5 states there will be no significant effects in areas of great landscape value – this is an error – where landscape or visual effect has been classified as major or major/moderate this is considered to be significant in terms of environmental impact assessment regulations 1999

- 4.6 (Assessment of Residual Visual Effects) – Underestimates visual impact for several reasons e.g. incomplete humid analysis, textural understatement or omissions, photomontages underestimating true visual impact, photomontages setting white turbines against white sky, wireline diagram showing black turbines against a black grid
- 4.6.1 (ZVI Analysis) - Cumulative ZVI model omits Glens of Foudland
- No attempt to model cumulative effects of Clashindarroch and Aultmore
- SNH Guidelines indicate that ZVI Analysis should usually extend to at least 25k – Glens of Foudland lies less than 25k from boundary of Wind Farm
- 4.6.2 (Drummuir ZVI) – Understates turbine visibility – vast majority of area within 7k of proposed development has some visibility of turbines
- 4.6.3 (Receptors) – Not clear why such limited number of receptors have been chosen except to say that emphasis on mains settlements and main roads whilst neglecting smaller settlements closer to wind farm
- 4.6.3.1 (Settlements) – Fails to mention any rural settlements within study area. There are discreet settlements at Mulben, Auchindachy, Drummuir, Towiemore, Maggieknockater, Newmill
- 4.6.3.3 (Railways) – Keith to Dufftown Railway omitted
- 4.6.4 (Cumulative ZVI) – Section not valid because Glens of Foudland Development not included – this would change model of cumulative visibility significantly
- 4.6.5 (Viewpoint Analysis) – SNH state that the experience to date for example at Novar Wind Farm where photomontages prepared prior to development were compared afterwards to views once Wind Farm erected indicate photomontages generally underestimate true visual impact of wind farm
- One of photomontages sets white turbines against white sky – not a realistic assessment
- Photomontages/wirelines have turbines lined up with each other or other vertical features – cumulative view point 1 shows black turbines against a black wireline grid – in point 3 an incorrect alignment of photo and wireline image – topography of the horizons on each do not correlate
- Photomontages don't show any features of development beside turbines – no anemometer masts, access tracks, electricity substation and lines connecting to grid
- 4.6.5.3 (Viewpoint 3) – Magnitude of change incorrectly represented with wireline diagram – error as high sensitivity to change times moderate magnitude of change equals major/moderate not moderate as mentioned in ES
- 4.6.5.4 (Viewpoint 4) – First and fifth photographs show confusion over which town they are in
- 4.6.5.5 (Viewpoint 5) – Moderate impact sited whereas it should be major/moderate, effect on road users incorrect it should be moderate not moderate/minor as stated
- 4.6.5.16 (Cumulative in Viewpoint C1) – Glens of Foudland should be included
- 4.7 (Summary) – Summary of effects is incorrect given errors referred to previously
- 4.8 (Conclusions) – Incorrect conclusions have been drawn and errors and estimate of wind farm on landscape and visual amenity

- Inappropriate choice of receptors results in underestimation of high sensitivity receptors
- Cumulative ZVI seriously flawed due to omission of Glens of Foudland

- ES section 8.0 - Transportation and access
 - Calculation of increase in traffic on A95 at junction with C55H incorrect – each vehicle movement is a return journey so 59 vehicle movements equals 118 journeys which is a 12.3% increase in daily traffic movements on the A95 more than doubling the number of HGV journeys on this section of road
 - 8.3.2 (Traffic Management) – Movement of low loaders through Aberdeen and Aberdeenshire including centre of Inverurie will cause severe traffic problems on A96 – for six weeks there will be 10 journeys (5 return trips) of long low loader
 - 8.3.3.4 (Keith) – Journeys of low loaders through Keith will create considerable traffic management problems – deliveries will require pedestrian refuges to be removed and replaced with possible road widening – no plans to mitigate these problems

- ES section 10.0 - Electro Magnetic Interference
 - No reference made to users in vicinity who use Rosemarkie Transmitter – cumulative impacts between Drummuir, Paul's hill and Cairn Uish not discussed – developer can do no better than attempt to mitigate TV reception problems i.e. only reduce severity of problems not solve them

- ES section 11.0 - Socio Economic Assessment
 - Not true that onshore wind is only renewable technology currently economically competitive – Hydro power has long been competitive, price of onshore wind energy is higher than conventional generation – also paid for reinforcement of national grid – little evidence that Moray will benefit from turbine component manufacture – entirely incorrect to list RES presence in Glasgow or work carried out by Scottish based staff and consultants and public affairs support as a local economic benefit
 - Local Economic and Other Disbenefits During Development and Constructions – holdups on Roads cost individuals and businesses money – degradation to roads – during construction, displaced traffic will move on to other smaller and less suitable roads – communities closest to the development will suffer from noise during construction
 - Local Economic Benefits during operation – Moray Council will not receive benefit of business rates collected from proposed development
 - Example of House Prices in Gloucestershire continuing to rise after wind farm not comparable as it was a single turbine not a wind farm also on average house prices in Gloucester have risen by 89% since 1997 – this could not be reduced to a negative by the installation of a single wind turbine
 - 1996 Study by Institute of Local Government Studies in Denmark determine that house prices were cheaper in proximity to even a single wind turbine – FPD Savills agree with this view - in Wales at least one householder has had their Council Tax reduced because of noise

- ES section 11.2.3 - Community Fund
 - As there are many communities badly impacted and many people who would not regard themselves as members of any particular discreet community this method of redressing impact is social divisive
 - Composition of stakeholder committee gives many people extreme cause for concern – local stakeholders were a group who might well appear to have been hand picked by the developer from people with vested interest in Drummuir Estate – Committee was chaired by an employee of PR Company employed by RES – Stakeholder Committee failed to consult immediate local community – as Drummuir Estate are more or less only beneficiaries of proposal as a matter of social justice Council should attempt to ensure that no part of community fund is spent on projects on Drummuir Estate

- ES section 11.3.2 – Tourism
 - Developer attempts to suggest that wind farm may become tourist attraction and sites two examples – Echo Tech Centre in Swaffham is not a Wind Farm as it is the Visitor Facility with a single turbine – due to big drop in numbers it recently announced it was unable to pay debts and wants to close – Delabole Visitor Centre was first operational Wind Farm in UK – comprises 10 small turbines owned and operated by a company which is owned by a local farmer and his son – located in very popular tourist area and had great novelty value - developer uses independent public attitude surveys to support claim of low/moderate effect on tourism – whether results of 2 public opinions surveys for national wind power are independent is questionable as noted in Scottish Executive document
 - Recent research by Visit Scotland determined that rather than being a tourist asset wind farms are likely to cause long term harm to Scotland’s tourist industry – 58% of responses thought that wind farms spoiled the look of the countryside – 28% said they would avoid an area where there was a wind farm

- ES section 11.6 – Summary
 - Criticisms referred to above indicate that conclusions and summary are entirely wrong.

Comment

Many of the issues raised above are dealt with elsewhere in the comments on the objections or in the report e.g. rationale for the project, government policy, Scotland’s renewable resource, contribution of the wind farm to energy supply, misleading information at exhibitions before application, transportation and access, electromagnetic interference, community fund and impact on tourism.

The Environmental Statement has been the subject of wide ranging consultation with other bodies and organisations as part of the consultation process on the application. It has also been favourably reviewed by the Institute of Environmental Management and Assessment. The veracity of the information provided has not been questioned as part of this process.

The landscape and visual assessment has been considered by a range of consultees, including SNH. As a result of this, and consideration by officers, the main change required about landscape impact was an amendment to include the cumulative impact

of the approved wind farm at Glens of Foudland (Aberdeenshire) along with the approved wind farms at Paul's Hill and Cairn Uish. This resulted in the application being re-advertised with another round of consultations.

The application is being recommended for refusal because of its visual impact.

Inadequate/misleading consultation and publicity

Stakeholder group

- RES set up a stakeholder group in Drummuir – the vast majority had direct connection with either Drummuir Estate or owners of the Estate – not only were some of nearest residents to proposed site not invited on to the Committee, they were not even informed of it by RES.
- Chairman of Meeting was a member of Public Relations Firm employed by RES.
- Stakeholder Consultation not representative
- Although Stakeholder Committee formed consisting of community representatives, immediate neighbours and other interested parties were never consulted
- Concerns of majority of local community not fully taken into consideration – only learned of proposals approximately 6 weeks ago – certain people in community were informed nearly 2 years ago
- Lack of information came out of Stakeholder Committee Meetings
- Stakeholder Committee did not represent immediate neighbours and others with an interest in development
- Two years of discussion were not shared with local people
- Stakeholder Committee – remained unknown until mid-October – Chaired by PR Consultant employed by RES and two other RES employees present at last meeting – 13 members of public participating included owner of Drummuir Estate, his wife, two estate workers, one estate tenant, representative of Eco Link (local organisation Chaired by Estate Owner's wife) – remaining 7 participants included 3 members of Community Association and 3 local residents
- Concern at manner in which RES have presented their proposals within confines of invited membership of Stakeholder Group

Leaflet circulated before application

- Mailshot – Drummuir Wind Farm News – circulated by company not reliable – contained misleading and untrue statements e.g. suggestion that 60% of Moray's households could be provided with energy is misleading as it will go into the grid, legacy free electricity untrue as several thousand tons of concrete will be left in ground when Wind Farm eventually closed, contribution of £100,000 per year to local authority misleading as business rate money transferred to Scottish Executive who will redistribute it as they see fit, suggestion that options have been raised by local people untrue as no discussion of options took place at Stakeholder Committee, photograph of man and child below wind turbine good illustration of RES desire to mislead

- RES claim that as exercise in consultation, they circulated leaflets and held four public exhibitions in week prior to planning application – this only serves to highlight true lack of consultation during planning procedure.
- Photomontage shown in document posted to 4000 people out of proportion and does not show full impact of proposal - SNH Guidelines on environmental impacts of wind farms and small scale hydro-electric schemes state photomontages generally underestimate true visual impact of wind farm

Public meetings

- Only open meeting was independent meeting in Dufftown that Mr. Ray Hunter of RES was invited to address – he chose to misrepresent the purpose, mood and feeling of that meeting to the press.
- Incorrect information provided by RES at exhibitions in Mulben and Dufftown – computer operator showed incorrect height of turbines – hub height had originally been set below 50m and diameter value had been set to about 56 or 58 resulting in total turbine height of 75m – seems strange that an honest and professional company could make such a critical mistake
- Similar error occurred at another exhibition – difficult to know how many people were shown incorrect images.
- At recent presentations RES were found to be deliberately misleading the public with computerised drawing that scale down the size of the wind turbines
- Many people unhappy with manner in which RES have conducted their consultations with visual displays minimising height and effect of turbines
- RES are claiming that the majority of people are behind the project which is false
- In newspaper article RES claimed that at Dufftown Public Meeting huge majority against the wind farm at Drummuir was not indicative of general feeling – RES have demonstrated that they are dishonest and duplicitous – in view of this submitted application in EIA are also likely to be less than accurate
- Consultation with local community disingenuous – until recent road shows by RES it was apparent that local people were unaware of scale of developments, unaware of size of turbines and unaware of scope of visual disturbance

Other consultation/publicity concerns

- Application flawed as requirements of EIA for community consultation have not been met
- Contrary to Agenda 21 in that the indigenous population could not possibly have a say in what happens to the environment at Drummuir because the 28 days allowed is insufficient for the 'indigenous population' to absorb EIA.
- RES are currently being investigated by the Advertising Standards Authority for false and misleading information – reference is made to Drummuir Wind Farm News circulated to 4,000 households on 30th October, 2002
- RES at being investigated by the ASA for a similar application in Wales in 1999 and found guilty
- Consultation process by RES unacceptable – excuse that meetings would have been unmanageable is spurious

- Public consultation exercise did not seek a representative sample of local opinion
- First news of proposal was in Banffshire Herald
- Wind farm lobby do not have wellbeing of society as the right priority – try to pull wool over people’s eyes with a lot of hypocrisy used for profit sake of big multi-national companies
- Developer produces answers to all objections received yet objectors do not get opportunity to comment on or query veracity of answers
- Council states that everyone has access to information needed to play full part in their society – can Council ignore blatant attempt by RES to withhold information about Wind Farm until last possible moment to minimise input into planning process.
- Local people have not been kept informed or worse have been misinformed
- Appalled by arrogance and lack of regard for people of area by representatives of RES who said that they were a business and not concerned with views and feelings of those most affected
- Closed door approach to community consultation
- Bitterly disappointed at attitude of Community Councillors who claim to represent Botriphnie Parish

Comment

The consultations/publicity carried out by RES before the application is the responsibility of RES. The manner in which this was done is not a basis for determining the application. The objectors consider that the applicants provided misleading information at public exhibitions before the application but the applicants have stated that there was a computer error which was rectified when it was brought to their attention. There are no statutory requirements or processes for publicity of a proposal by an applicant in advance of an application. The application needs to be determined, as submitted, on the basis of development plan policies and material considerations. It has been subject to the relevant planning application publicity procedures including neighbour notification and advertisement.

Public opposition

- Although RES claim general support for Wind Farms - Scottish Executive survey shows 67% said there was something they liked about a Wind Farm – it hardly seems to be an accurate guide to inform granting of planning permission – it also indicates that 33% bear nothing that they liked.
- Most informed public are against wind turbines in Scotland which can be seen at information meetings and by reading reader’s letters in the local press
- Studies from Holland suggests residents have regretted allowing them in their area
- Meeting of Residents of Boharm and Mulben took place in Mulben Village Hall on Thursday, 28th November – 60 people attended – the majority totally opposed to wind farm – vote taken with almost unanimous result bar 3 abstentions
- Meeting of Strathisla Community Council, Mulben on 28th November – 36 people voted – 35 were against and 1 abstained
- Monthly meeting of Strathisla Community Council on 4th December - vote taken – 3 members in favour and 8 members against with 1 abstention

- 5th December AGM of Mulben Village Hall Committee and Community Association - unanimous conclusion with all 16 members voting against proposal

Comment

The level or volume of public concern is not, in itself, a basis for deciding the application. SPP1 identifies legitimate public concern or support expressed on relevant planning matters as being a material consideration. It is the planning matters raised that are material.

Adverse Visual Impact

Size and height

- Disproportionately tall 100m to the blade tips
- Wind Farm consists of 21 structures each 330ft tall on top of a hill – to say the effect on visual amenity is acceptable can only be reached by someone outwith Moray or with defective eyesight.
- Turbines would be almost three times higher than Covesea Lighthouse at Lossiemouth which is 118 ft high
- Adverse visual impact – turbines will be 3.3 and 5.5 times the height of a 132kV pylon and more solid
- 50 ft higher than enormous Ben Aigen mast (already a blot on the landscape) is not the way to protect environment
- Knock is 370 ft above sea level as is McHattie's Cairn and turbines will be 100m on top of this
- Trust all members of Committee have visited the site and viewed proposal with mast on Ben Aigen in mind – mast on Ben Aigen towers over landscape and is visible for many miles – 50 ft higher than Ben Aigen mast with 21 turbines visible to hundreds of dwellings
- Site is in a high and prominent position in area with significant population
- RES claim that by necessity wind farm sites have to be exposed which is why they are on higher ground – how many Danish wind farms are located on hills

Extent of visual impact

- Turbines would be seen for over 30 miles
- Proposal involves sterilisation and creeping urbanisation of whole area between Spey and Keith
- Sensitivity to change section of landscape character assessment by SNH relating to upland moor landscape sums up effects to be expected – i.e. high quality in large scale of the landscape combined with long distance views to produce a landscape which is a high sensitivity to change – flat undulating nature of open landscape combined with long distance views in simple visual composition will tend to result in new elements creating focal features providing an indication of scale and distance thus modifying its open character
- Impact on views over Hill of Towie
- Wind turbines on a point at least 370 ft above sea level would be visible for miles around

- Most telling evidence of visual impact is the series of ZVI maps – gives idea of vast scale of project
- As Hill of Towie and associated hills part of skyline from points in excess of 6 miles to north, east, south and west loss of visual amenity will be evident in area in excess of 100 sq. miles
- Overlooks settlements of Towiemore, Mulben, Maggie Knockater, Auchindachy, Dufftown, Mulben, Keith and Drummuir and many homes in between - residents will suffer loss of amenity
- Masts will be visible to hundreds of households and will dominate landscape
- On one hand RES claim that potential effects on the landscape and visual amenity are acceptable – this must be less than the truth when they also admit there may be significant effects on visual amenity at several designated sites.
- Loss of visual amenity to large section of population

Nature of visual impact

- Moray has some of the finest countryside in North of Scotland – Speyside Way, Castle Trail and Whisky Trail to encourage tourists – industrial turbines highly visible does nothing to enhance Moray's unspoilt image
- Damage to landscape character and amenity of Drummuir area
- Part of a massive assault on the landscape
- Defacing industrialisation of priceless heritage
- Intrusion and blight on the landscape - detract from beauty of countryside
- Area of outstanding beauty should not be turned into industrial site
- Wind farms scour and despoil countryside for decades after they have fallen into disuse
- Lights will be obtrusive at night
- Drummuir should be protected and kept as a beautiful wild area
- Wind turbines will not be absorbed into background – severe eyesore
- Will turn beautiful countryside into industrial scrap yard
- Area of wind farm is of outstanding natural beauty
- Untouched hill landscape – one of Scotland's biggest assets – would be badly spoiled by turbines and roads
- Preparation and servicing of site will lead to permanent scarring of landscape
- Domination of landscape and eyesore to local community
- Negative impact on landscape will be vast
- Loss of green belt

Cumulative impact

- Six sites already identified in area which could result in 190 turbines.
- In association with other five similar wind farms in the area will result in unacceptable industrial build up in countryside.
- Scheme at Clashindarroch, Aberdeenshire will have great impact on Moray
- Approach in Moray and adjoining areas is of a large number of piece-meal applications – should be treated as a whole because of cumulative impact
- Policy also states that there must not be unacceptable cumulative impact – even RES note significant cumulative and visual impacts at Ben Aigen.
- RES already been granted planning permission for 23 generators which will blight the Glens of Foudland.

- Cumulative effect of wind farms will have disastrous effect on landscape – no consideration of effect of sites at Clashandarroch and Glens of Foudland shown on planning application
- In association with the other five targeted sites in area there will be unacceptable industrial build up in countryside
- Cumulative visual impact of proposal and sites at Cairn Uish, Paul’s Hill and Glens of Foudland will compound detrimental effects – also plans for other wind farms nearby at Aultmore and Clashindarroch
- Unacceptable cumulative impact – 6 sites within a 14 mile radius of Drummuir – Paul’s Hill and Cairn Uish already passed by Moray Council – Glens of Foudland already passed by Aberdeenshire – Aultmore and Clashandarroch about to be submitted – there will be 160 330 ft turbines and 21 220 ft turbines inside a 14 mile radius – already 267 turbines in Scotland
- Massive development at Clashindarroch will bypass local planning process destroying another scenic area of North East Scotland.

Other visual impact issues

- Unseemly rush to adopt most environmentally intrusive form of renewable energy in the Moray countryside - Jumping at first example of renewable energy and then being stuck with partially efficient eyesore on hills for next 25 years totally irresponsible
- Visual impact impossible to justify – any attempts at mitigation will be derisory, ineffective and doomed to failure - impact cannot be justified or mitigated
- Wind Farms in Wales are now trying to expand on the basis that the sites which are occupied as rural have changed to industrial
- If consent granted how long will it be before they decide more turbines required
- Appropriate moment for comparison to be made between present appearance of wind farms and observations made by members of Planning Committee at times applications have been made for houses particularly where officials have recommended refusal
- Introduction of wind farm into area unacceptable and this is already beginning to suffer the blight of suburbanisation
- Wind farm could be in more remote location than this beautiful area
- Exposure on lower ground i.e. offshore wind power, wave power, tidal stream energy would be preferable
- Permission for turbines in Moray should be restricted to sites where they would not impinge on landscape or people’s livelihoods and pleasure
- In other areas it is possible to hide most of turbines on sides of hills in gullies mostly invisible to passers-by – why is this not possible in Moray
- Hills not needed for wind farms – Denmark and Holland are flat and have significant numbers of turbines
- Moral duty to protect landscape for future generations
- Pylons carrying electricity will have further visual impact
- Link cables and pylons will cross some of most beautiful parts of country
- If approved everything should be done to ensure that poles rather than pylons are used to carry electricity and route kept well clear of Towiemore

- If approved should be specified that connection to existing power lines be put on the ground or at least be put on poles – already too many pylons in landscape
- Connection to grid in previous applications has been underground – conditions imposed by Moray Council

Comment

The application is being recommended for refusal because of its visual impact.

Restoration

- RES claim that they will restore site leaving no pollution for future generations – this means they must remove the massive concrete bases and return it to a peat bog in undisturbed fashion – if they do not, and how can they, they are not telling the truth.
- Once turbines have lived their life a huge sterile tract of land will be left and not convinced by claim that it will be restored
- Who removes the thousand of tons of concrete supporting wind farms after their life expectancy of 15 – 20 years
- Any development must include water tight method of ensuring developer pays for decommissioning
- Is there a bond put up to cover reinstatement

Comment

There has been no request for the removal of the concrete bases following the consultation process and restoration could include the retention of the bases. Restoration could be dealt with through conditions and, if necessary, a legal agreement to include any financial arrangements for decommissioning.

Impact on flora and fauna

- Loss of internationally important moorland habitat with associated flora and fauna in contravention of both Wildlife and Countryside Act 1981 and EC Habitats Directive
- Impact on wildlife cannot be predicted
- Wind farm would spoil natural amenity of area and disturb wildlife
- Orchids, grass-of-parnassus and other annual roadside plants will disappear as larger roads are carved out of countryside
- Henharrier also lives on moorland and it is believed there are only 400 breeding pairs in the whole of the United Kingdom
- Hill of Towie is one of the very few heather clad hills in the area
- Wildlife, flora and view of Ben Rinnes treasured by locals and visitors
- Affect on bird life – gusting winds and low visibility will make them vulnerable to injury
- Preparation and servicing of site will result in habitat disturbance and loss

- Vehicles, bore pits and introduced materials involved in construction of industrial site will have negative effect on blanket bog and wet and dry heath, birds, other fauna/flora such as lesser twayblade
- Damaging effects and intrusiveness upon natural habitat of local wildlife
- Thousand of tons of concrete and tarmac would harm untouched nature and echo system

Comment

This issue has been dealt with in the report.

Noise

- Noise will be unacceptable
- RES representative reluctantly admitted that turbines would be audible at distance of over 2 miles
- Turbines produce percussive sound which is particularly stressful
- No assessment of acoustic implications of development during construction
- Visited wind farm in Scottish Borders and found them noisy and alien
- Even where devices are not very low they may still by their pattern of noise and by there persistence be extremely unpleasant – steady background drone like a fridge can be irritating but noise from individual turbines will mix so that individual frequencies reinforce and cancel intermittently and may well be very wearing
- RES state there will be no noise problem but no mention made of blasting during construction, increase in traffic noise and general construction noise – concerned about aerodynamic noise or blade thump – noise would be hard to ignore especially in quiet summer nights
- RES state increase in noise level would be low at neighbouring dwellings, a higher noise level is permissible during night time hours and one factor determining acceptable noise level is effect noise limits might have on productivity of wind farm – seem to have situation where people who live in an area that much of the time is virtually silent can have an increase in noise imposed on them particularly at night for the sake of productivity of Wind Farm.

Comment

This issue has been dealt with in the report

Roads

- Consent will not be given for proposed road widening onto ground under separate ownership
- Proposed road widening would effect forestry operations and ultimate value of timber
- Effect of heavy traffic on A95 would be considerable – this is a road which is easily damaged

- Turbine blades would need special road improvements on part of roads from Aberdeen to Morayshire – they are too large to be transported by rail – Moray would have to bear the cost for road improvements
- Roads leading to site unacceptable for development
- Obstruction of roads during building of wind farm
- Estimated 80 concrete lorries per day for an estimated construction period of 9 months will travel along A95 from Keith to Glentauchers Distillery and then along single track road to site – appears RES intends to widen road from Glentauchers to site – no mention made of any intention to maintain the damage caused by 160 daily concrete lorry trips along A95
- Industrial build up in terms of heavy goods vehicles developing site will damage roads
- ES has errors in calculation of traffic movements which understates these movements

Comment

Any legal permission required to use land in separate ownership is not a planning matter. Both the Trunk Roads Authority and the Transportation Manager have been consulted and neither have objected to the proposal.

Effect on Access

- Adverse effect on access – people will not want to walk moors if wind farm erected

Comment

There are no rights of way identified through the site. However the applicants are looking at how the wind farm tracks could link with existing recreational tracks in the area.

Threat to Aircraft

- Turbines extending approximately 1600 feet above sea level will be threat to aircraft activities
- MOD reluctance to object is not because it is a risk to flying but because there is Government pressure brought to bear in the same way that planning officers are intimidated by NPPG6 and PAN45

Comment

This issue has been dealt with in the report.

Impact on Private Water Supply

- RES unable to guarantee that there would be no pollution, drying up or destruction of private water supply or that existing water courses would not be altered
- Towiemore Community draws its water from spring just 875m down the hill from wind turbine T18 – Water Authority says it has no plans to expand public water

supply – need assurance that if supply is damaged developers will ensure that another supply is provided free in perpetuity

Comment

Environmental Health have indicated that the development should not detrimentally affect the quality or quantity of private water supplies in the surrounding area and have recommended conditions. The applicants have indicated that they are prepared to be bound by a condition or agreement to guarantee the integrity of supplies to dwellings currently served by private supply.

Adverse impact on property values

- Serious negative impact on local property prices - house prices in Wind Farm areas are depressed
- Main and only investment from most people is value in their homes
- Denmark already witnessing rise of successful cases for compensation in respect of property blight from Wind Farms
- Intend to restore dwellings nearby – wind farm will be detrimental to value and amenity of these properties
- Adverse effect on demand for property
- Assume Moray Council will reimburse all property owners who suffer from fall in value - what are Council's proposals for compensating property owners - will expect a rates rebate
- Would not have gone ahead with purchase and renovation of house if proposal had been known of

Comment

Property values are not a planning matter.

Adverse impact on tourism

- Serious negative impact on tourism - especially as areas farming and agriculture in doldrums
- Area important in growing contribution tourists are making to Moray's economy and wind farm would be unattractive to them
- Tourists do not visit rural areas to be greeted by industrialisation
- Damages landscape-based tourism
- Impact on tourism needs to be considered before consents granted
- Report being produced by Association of Scottish Self Caterers in conjunction with Scottish Tourism Forum should be considered before decision made
- Survey by Visit Scotland shows disastrous effect on tourism – only independent survey to have been carried out into compatibility of wind farms and tourism demonstrates that significant number of people could be put off visiting area where there are wind farms
- Figures provided by Visit Scotland suggest proliferation of turbines will cut visitor numbers by over 25%

- Recent Visit Scotland survey indicated that 26% of those surveyed would avoid an area containing a wind farm - Moray which relies heavily on tourism cannot afford to lose 26% of visitors - 58% of those interviewed said turbines would spoil landscape – reveals tourists will not visit areas with wind farms
- Industrial development in countryside which will destroy employment in tourism and not create any employment to compensate
- Close examination of Mori Scotland Poll commissioned by wind energy lobby shows that of 307 tourists (itself a very small sample of overall tourist numbers) 83% of respondents came for landscape but 52% did not know where the wind farms were situated – this negated any views that they then expressed in the rest of the survey – respondents were answering from position of ignorance which invalidates replies – Mori Poll can not be used to uphold application for wind farm at Drummuir
- Poll commissioned by Wind Energy Lobby themselves concedes as its first point that around 80% of Scotland's visitors come for beauty of landscape
- Recent Mori survey in Argyleshire claims no adverse effects on tourism with only 8% of tourist against wind farms – but those 8% will not come back and may well discourage other potential visitors – any business finding 8% of its customers complaining would consider it a serious problem
- Recent surveys carried out show tourists will not come to areas of wind farms
- Moray has areas of high scenic quality and is popular for activity type holidays
- Come to Mulben each year for holidays - will reconsider plans for future holidays if wind farm approved
- Foreign visitors from Denmark and Holland opposed to wind farms and negative effect that they have had in their countries for little material gain - have advised they would not return if area covered in windmills
- For last 10 years have spent 2 holidays a year in Mulben area travelling 400 miles each way – view from cottages rented would be marred and would seriously consider taking custom elsewhere
- International visitors to Shetland Pony Stud which is internationally known cannot understand how wind farm could be permitted in area of such landscape quality
- Clients of holiday cottages doubtful if they would go ahead with holiday next year
- Regular visitor to area for holidays - inconceivable that region keen to encourage tourism could possibly permit of this nature under any Development Plan
- After years of holidaying and working in Wales no longer go there because scenery ruined
- Have visited Scotland for many years – wonderful scenery – something which when despoiled cannot be replaced
- Regular visit to Elgin and its environs for years - do not want to be forced to travel further to find such a resource
- Customers have indicated that they would think twice about returning to have holidays if wind farm approved
- Wales Tourist Board opposes wind generating installations in sensitive areas
- Visitors do not want to see blot on the landscape
- People attracted to Moray because of its beauty, peacefulness and idyllic countryside – allowing wind farm to go ahead will destroy this unique environment
- Research has shown that one of the prime reasons for people visiting Scotland is wild, natural and unspoilt scenery

- Millions been spent developing Whisky Trail and Tourism into flourishing business – turbines will cause visitors to avoid area
- Would disturb environment at Drummuir because untouched hills which tourists like so much would be ruined

Comment

This issue has been dealt with in the report.

Impact on television reception

- Wind Farms disrupt television reception - already poor reception at Drummuir and will deteriorate further
- Will Moray Council be supplying cable television to affected households
- Aware that RES had promised to resolve television problems but sceptical about how long it will take them to do so and how effective solutions will be - no guarantee that it will be entirely solved – only mitigated – otherwise compensation should be paid
- Which other forms of communication will be adversely effected

Comment

This issue has been dealt with in the report.

Better alternatives

- There are other methods of supplying energy which do not involve long term vandalism of the countryside
- Onshore wind is most contentious of all renewable technologies
- Wider impacts of loss of amenity, destruction of property values, damage to tourism, damage to environment must be considered in context of viable alternatives – including small scale nuclear developments
- Why have other alternatives not been considered e.g. redundant oil rigs, tidal power
- Energy conservation programme would buy time to further develop more benign technologies such as offshore wind or biomass crops
- Wave energy acknowledged as energy source of future limiting wind farms to short term use only
- Scotland already possesses a very energy efficient and green power source – water - more could be gained by investing large subsidies to wind farms in hydro, tidal or wave - Moray has plenty of opportunities to develop tidal power
- Hydro-electric contributes almost 15% of Scotland's electricity capacity – not 11% stated by the Scottish Executive
- Investment in wind energy will be better served by investment in solar power and encouraging energy conservation
- Alternative strategies for achieving energy efficiencies set out at KYOTO and elsewhere exist such as solar power – ideal source for Moray
- Local Plan could be amended to include requirement that all new planning applications include solar energy production

Comment

Regardless of what alternatives may or may not exist the application, as submitted, needs to be determined on the basis of development plan policies and material considerations.

Surplus of electricity/renewables targets already exceeded

- Excess capacity especially that from renewables is destined for South-East England where the population will not have Wind Farms and the English Government will not achieve target
- Already over capacity in electricity generation with prominent authorities questioning economic sense of trying to use such an uncertain power source
- Scotland already has 40% excess capacity – already exported to England
- Scotland produces 70% more electricity than it uses
- Scotland already self sufficient in electricity - England already supplied with surplus from Scotland
- No use to Scotland as most electricity will be exported
- Targets for production of electricity from renewable sources already exceeded by Scotland - much of it already coming from renewable hydro-electric plants
- Scotland already surpasses 10% renewable energy target for 2010 and therefore is not obliged to destroy more of its landscape in favour of extremely poorly thought out and muddled energy strategy as pointed out by Governmental Advisory Body – Royal Academy of Engineers in report of 30th August, 2000
- Scotland regarded as having more lax laws than England but Scotland already meets more than 10% renewable target so approved and proposed developments are turning Scotland into England's Wind Farm
- Scotland already surpasses 20-10 target of 10% renewable energy – this is in hydro-electric power which is clean and green
- Scotland has enough electricity and already surpasses 10% renewable energy target for 2010 – Scottish Executive fudging figures because if all renewable energy sources included Scotland has reached 20%

Comment

The amount of energy produced or its destination are not a basis for determining the application any more than the output or market of any product connected with a process being applied for. It is the impact of the development that needs to be considered on the basis of development plan policies and material considerations.

Wind energy ineffective

- Modern turbines comparatively inefficient and overall they help the environment less then they harm nature through manufacturing of turbines and building infrastructure for them
- RES state that every year the Wind Farm will produce sufficient electrical energy to satisfy average requirements for about 21,600 homes, must be based on

exaggerated claim – impression always given that turbines will work at 100% capacity for 100% of the time.

- Industry and Government recognise that 30% of the maximum output is the maximum annual average output that can be achieved.
- Take 30% of the maximum output of 42 megawatts – which is 12.6 megawatts – then divide by the number of houses claimed will be served by Wind Farm this gives 583 watts – is this a reasonable figure for average electricity use for a household – enough for six lights, half of one bar electric fire.
- Wind generators are only about 25% efficient i.e. around 12 megawatts and not claimed 42
- National installation of very large amount of wind power unjustifiable – at present all 1000 turbines in the UK only contribute 0.25% of UK generation (DTI 2001)
- Wind power can only play a very small and intermittent part in UK's overall energy strategy
- Energy produced is so relatively trivial that Grid Distribution Managers effectively ignore it
- Experience in Denmark shows that above 10% intermittent power in the Grid introduces intolerable instability
- Wind farm technology very inefficient compared to other forms of power generation
- Considerable scientific and engineering opinion – Royal Academy of Engineers Report to UK Energy Minister, August, 2002 – states that power generated by plant would not make a significant contribution to National Grid - construction of turbines unrealistic in terms of producing reliable supplies of electricity and substituting any existing power station
- Institute of Electrical Engineers has pointed out that dedicated back-up will have to be provided so that a secure electricity supply is not jeopardised.
- Unpredictability of supply allows it to parasitise on existing back-up of grid system
- Wind power is inherently inefficient requiring constant reserve to be maintained by conventional power stations with times when the wind is too light or too strong
- Little more than token to green energy – they need conventional power backup 75-85% of time - will not shut down any power stations
- Led to believe that electricity prices might fall – prices will rise by up to 6% to pay for this new energy resource
- DTI paper on Renewable Energy states that electricity prices will have to rise by at least 4.4% just to cover costs of the grants awarded to renewable energy companies – with downturn in electricity prices tax payer will have to fund this to an even greater extent.
- At present the renewable obligations subsidy of up to 30 pound per megawatt is nearly twice wholesale value of the electricity, not to mention largescale subsidies for building wind turbines
- Holland and Denmark getting rid of wind farms as uneconomic and ineffective
- Electrical supplies can be affected if one collapses

Comment

The efficiency or price of electricity produced by wind energy are not matters for the Council to determine. Neither are they a basis for determining the application. For

instance an application for an industrial premises would not be determined on the basis of the efficiency of the process being applied for or price of the product.

Will not lead to reduction of emissions

- RES claim that production of electricity from wind energy has low gas emissions misses the considerable amounts of CO₂ produced in the manufacturing transport of the wind farm components.
- Environmental damage including total CO₂ cost of development will far outstrip any perceived benefits
- Rollout and deployment of wind turbines will become uneconomic and the contribution to CO₂ saving will dwindle to nothing
- NPPG6 and Moray Council's Wind Energy Policy have principle to promote renewable energy developments – misses point that first priority should be to seek reduction in energy consumption which would have far greater effect on reducing CO₂ emissions than substituting one power generated source with another
- Carbon monoxide levels will not be reduced by wind farms – with present number of wind turbines in operation CO₂ levels have actually gone up – vast areas of forestry have been cut down, the very agent required to absorb CO₂
- There is time for research and development on renewables that are not yet viable commercially and in meantime energy conservation would have a significant impact on production of CO₂ until integrated system develops.
- Wind farms do nothing to achieve emissions reduction envisaged by KYOTO agreement as unpredictable output has to be covered by saving capacity of reliable generation (thermal, coal, and nuclear) – Scottish Executive admits this in document called Scotland's Renewable Energy Policy – Beyond 2010
- Carbon emissions will continue regardless of Drummur initiative
- RES claim that by the displacement of fossil fuels a certain amount of pollutants will not be produced but there is no data to accompany this assertion – led to deduce that the savings will be at this level if the turbines work at 100% for 100% of the time. As maximum expected by the industry is 30% the RES claims can be reduced by 70%.
- Producing cement for concrete used in wind farms is very energy intensive and is one of the worst environmental polluters - manufacture of concrete contributes more than 10% to UK's CO₂ emissions
- Methane gas production from ruminants is expelled gas by either burping or flatulence – globally cattle produce 60m tons of methane every year and KYOTO protocol is aimed at keeping methane increases below 8% for 20-12
- Pound for pound subsidising installation of other energy saving measures would reduce greenhouse gas emissions by up to 50 times the amount achieved by subsidising wind turbines
- Energy from wind farms will not result in a single percent reduction of existing pollutants
- Existing power stations will not be closing down

- In order to achieve significant targets in green production when energy demands are growing every inch of Moray's higher land would have to be covered by turbines
- Subsidising installation of other energy saving measures will reduce greenhouse gas emissions by up to 50 times the amount achieved by subsidising wind turbines
- Each turbine requires enormous usage of energy to produce them and large areas of concrete, asphalt and steel
- Told it will help solve greenhouse gas problem – now seems benefits will be minimal
- Current fires raging in Australia will create larger holes in ozone layer than the difference the wind farm could make in hundreds of years
- Single minded focus on wind power but hear nothing about investment in reducing electricity consumption
- Solar energy, better glazing and insulation could be funded with cash being put into wind farms

Comment

Despite the clear difference of view between the objectors and applicants on this issue national guidance is committed to renewable energy, particularly wind energy, as part of national commitments related to climate. Development plan policies for renewable energy were prepared in this context.

Limitations of grid

- With all additional generators in Scotland there is only 400 – 500 megawatts spare capacity in the Grid – Scottish and Southern Energy are planning a new link to Central Belt but this will cost 1.6b, take one year to survey and 3 good summers to built – no planning application should be approved without confirmed outlet to the grid
- Transmission to Central Belt will lose 8% of power which will presumably double before it reaches major English centres of population and usage
- England is investigating (along with Greenpeace) a 15,000 turbine series of winds farms 12 – 20 miles offshore between Thames and Humber – this will render Scottish wind energy with its long and expensive transmission costs surplus to requirement

Comment

The connection to the grid is a matter for the applicants to resolve along with the relevant statutory undertakers.

No local benefit

- No benefit to local people.
- Danger of Moray being seduced by money making potential seen by landowners and firms intending to build wind farms

- Electricity generated is not for consumption in local area - electricity would be fed into the National Grid and used in areas of heavy population, such as English cities - therefore no benefit to Moray
- On one hand RES claim operation of wind farm would have a positive effect on local economy yet elsewhere state wind farm would not be permanently manned but would have maintenance visits by a crew of two people 2 – 4 times a month.
- Councillors should consider the number of local jobs after construction – RES only mentioned two people visiting site 2 to four times a month and there is no guarantee that they will be from Moray
- Temporary work force averaging around 20 would not include local people
- No contribution to new jobs
- Stated wind farms will bring employment – Moray has such low unemployment that foreigners are having to be brought in to fill vacancies
- Need to look carefully at why companies with profits to make and share holders to satisfy target Scotland rather than looking to site developments in south where electricity will be consumed
- Wind farms should be sited to south where the power is needed
- Plenty of locations in England where wind farms could be accommodated
- RES could not even confirm that turbines blades would be manufactured in Scotland
- Local people have been asked to turn countryside into factory turning out power for lowlands of England
- No significant local compensating benefits
- Moray being used as easy option for Scottish Executive to meet targets for renewable energy developments without due regard to residents
- Wind farms only make profits for developers and landowners
- Little contribution to local economy except for rents paid to owner of Drummuir Estate - only benefit is to Drummuir Estate
- Although unrealistic to expect all landscapes to be preserved without change it is only reasonable to impose changes which bring either a major regional benefit or are of outstanding value to the whole country – this is not achieved by wind power
- If Wind Farms considered useful to cause of global environment protection then build them out to sea on disused oil platforms or in areas which will not seriously and adversely effect local communities
- If Scotland has to generate power to feed south it would seem more suitable to place turbines near to destination
- Already produce more than enough power and do not need to make sacrifices for household in south
- Will turn countryside into industrial site for benefit of others with little or no benefit to local community
- Irreparable damage caused to fabric of local communities as very few local people stand to benefit
- Location unacceptable – why are they not proposed for already industrialised or spoiled areas perhaps it is because more highly populated areas would give more resistance to developers
- Drummuir will not benefit anywhere as much as is suggested
- Scotland and Wales already bearing brunt of Westminster's commitment to renewables and North and North-East of Scotland doing more than its share
- Developers only involved for money and care nothing about countryside or people

- London based agenda to meet targets on renewable energy
- If Government requires 18% of renewable energy by 2010 then more populated areas should shoulder their share of this burden
- Surrounding areas benefit increasing number of film companies who appreciate Scotland's unspoilt countryside – will Moray miss out on this
- Developers are foreign therefore none of revenue generated will stay in Scotland

Comment

There is no inherent need to demonstrate a local benefit, the issue to be determined is whether or not the impact of the development is acceptable in terms of development plan policies and material considerations. If the proposal complied with policy any perceived lack of a local benefit would not, in itself, be a basis to refuse the proposal. The destination of the electricity generated or the possibility of other locations for wind farms are not a basis for determining the impact of this particular application.

Impact on Riding Club

- Council's wind energy policy guidance requires environmental impact assessment to provide details of consultation with local recreational groups - Endurance Riding Club has held large events at Drummuir Estate for many years – routes go across and around Hill of Towie and MacHattie's Cairn – as recreational group disappointed not included in consultation
- Club's concern over access and future of event – suggest developers take opportunity to use proposed access roads to expand access in area particularly to west of MacHattie's Cairn
- Not clear if 2 new access roads will be gated at junction with unclassified road – request provision for passage by horses and pedestrians

Comment

The applicants have indicated that the track network at the wind farm will provide an increased opportunity for equestrian recreation.

Community Fund

- Community fund amounts to little more than bribery – if there were no problems with installation of wind farms as RES claim, then why would they need to provide any form of compensation
- Community Funds cannot repair social damage done if development is approved
- Not interested in any backhand bribes by development companies to the communities involved
- Most appalling strategy adopted is community fund bribe.

Comment

The provision of a community fund by the developer is a separate matter between the developer and the community bodies involved. The existence or amount of the fund is not a basis for determining the application. The fund, in itself, cannot secure compliance with policy or justify a departure from it.

Other Comments

- North East Scotland earmarked by developers as an easy area due to large number of landowners controlling vast tracks of land.
- Just because area sparsely populated does not mean that residents have no right to expect planners to protect their interest and amenities
- Is it to do with the delay in implementing NETA in Scotland or because we are seen as less sophisticated and more compliant
- Views of residents should be taken into account
- RES were unsuccessful in two previous applications in Angus and Stonehaven
- Planning system geared totally in favour of the developer which is why Planning Officers involved in application have to produce report that is in the long term interests of the people of Moray
- Councillors elected to represent local communities to the benefit of the whole
- Motive behind siting wind farm in Drummuir has nothing to do with protecting the environment
- Proposal considered in same way as enormous housing development or industrial parasite to be sold on by developers at a later date
- Greedy developers will stop at nothing to achieve their financial goals
- Duty of care to look after quality of countryside for future generations

Comment

The application is being recommended for refusal because of its impact on the landscape. The applicants motives or issues of land ownership are not planning matters.

APPENDIX 6B

Applicants response to original
objections/representations

The applicants have responded to the objections/representations and their comments are as follows;

Contrary to Development Plan

We point to the planning statement submitted by RES at the time of the planning application.

S/ED1 - Wind farms are clearly a specific type of development, as specific as forestry, and it is clearly inappropriate to target such development to "towns and established business areas" - this is recognised by the mapping of 'preferred areas of search' in the Council's Wind Energy Policy Guidance.

Wind farms inherently bestow considerable environmental benefit (they are driven by international and national environmental policy after all) and in ensuring that the policy to "safeguard the environment" is respected it is important to balance the environmental benefits against any local environmental impacts. The EIA process ensures that the latter are minimised and therefore we suggest that the wind farm is totally consistent with this policy.

In terms of tourism, we point to the specific response later. In short we reiterate and claim there is evidence to suggest that the wind farm is likely to have a low to moderate positive impact on tourism.

S/ED7 - As advised in previous communication, we maintain that this policy was never written with wind energy in mind.

S/ENV1 - The policy to "conserve and enhance Moray's environmental assets" is laudable and the wind farm proposal sits very comfortably with that policy. At present Moray imports 100% of its electricity, mostly from fossil fuel sources (Peterhead power station) - the wind farm will displace combustion of fossil fuels and will therefore reduce the regional burden that Moray places on the global atmosphere and will in a small but proportionate way help alleviate the environmental damage being wrought by global warming. As stated in the EIS, we emphasise that "the Drummur wind farm would make a major contribution to meeting Moray's share of the national CO2 reduction target".

The policy requires sensitive siting and design and by taking our cues from the Council's Wind Energy Policy Guidance and by following an EIA process, we maintain that we have ensured total compliance with that policy.

L/ED10 - Respondents suggest that the proposal violates the requirement that renewable energy proposals are compatible with safeguarding the natural environment and are compatible with tourism. As discussed elsewhere we contend that the proposal is fully consistent with such requirements and there is extensive evidence to provide confidence in this conclusion. In terms of siting, we again point to the fact that the proposal is located within one of the few preferred areas of search identified in the Moray Wind Energy Policy Guidance. EMI, presumably in the context of television, is mentioned. We emphasise that the mitigation measures that will be taken will indeed fully resolve any localised problems that might be experienced.

L/ED15 - A respondent maintains that the wind farm cannot be designed to ensure visual impact is reduced to anything like an acceptable level. We deal with visual issues elsewhere but in brief reiterate that it is presumptuous to assume visual impact will be negative (public opinion polls repeatedly find that turbines are perceived positively - "fascinating", "sculptural", "elegant" being common descriptors), that wind energy by its very nature will have visual effects, that the design and EIA process ensures that visual appearance is a key consideration and that ultimately any perceived negative visual effect is no reason in its own right to refuse an application - its simply contributes to the overall balance of benefits and impacts.

L/ENV2 - The representation language is emotive and unsubstantiated - the EIS demonstrates clearly how nature conservation interests have been identified and how potential conflicts have been avoided.

L/IMP2 - Respondents adopt a presumptuous and emotive attitude to visual effect - we point to the care and attention that visual appearance commands in the design and EIA process. It is claimed that benefits of the wind farm are non-existent. We point to Section 1 of the EIS and reiterate the environmental need for the project and the degree to which it will make a substantial local contribution.

It is claimed we have ignored consideration of indirect effects on the setting of nearby sites of historic interest. This in fact is dealt with in Section 6 of the ES. Specifically Sections 6.4.2 and 6.6.2.2 which deal with indirect effects. In addition Scheduled Ancient Monuments and Listed Buildings are shown in Figure 6.1 of Vol. III of the EIS.

Contrary to Moray Council Wind Energy Policy Guidance

The points made in representation tend to ignore the environmental need for wind energy, the locational guidance given by Moray Council and the findings within the environmental statement - e.g. it is suggested we have failed to assess acoustic, shadow flicker and TV reception effects. These in fact are fully addressed in the EIS.

Respondents suggest that the wind farm is not needed by the people of Moray. We point out that the residents of Moray enjoy electricity supplies and that all power is currently imported - the 'burden' of the effects of fossil-fired generation being exported. We are offering Moray the opportunity not only to take responsibility for its own electricity production but to do so with clean generation.

Contravenes National Guidance

SPP1 - Much of the representation rails against wind energy and government policy and is irrelevant to the consideration of the application. Dealing with specific points:

- Protection from inappropriate development - the development is totally appropriate: a wind farm in a preferred wind farm area of search
- Community involvement - there has been effective community dialogue: we have worked constructively with a small but representative stakeholder

committee for many months; our aim has been to focus on the indigenous population rather than the entrenched, vocal minority opposition groupings.

- Sustainable development safeguarding long term needs of economy, society and environment - the wind farm proposal meets, not violates, all of these requirements
- Social justice and local community - RES has tried to engage with representative elements of the local community rather than concentrating on opposition groupings; we maintain this is consistent with wider social responsibility
- Environmental justice and degraded surroundings for neighbours - any perceived degradation to residential amenity will certainly not be to an unacceptable degree, whereas environmental justice demands that society recognises and takes action to counter the impacts that rich countries are having on the global climate and in turn the most vulnerable and poorer countries
- Departures from development plan and material considerations in favour of grant - we are grateful for the acknowledgement that there are major environmental reasons which must offset any perception of technical departures from development policies which were written without wind farms in mind

NPPG2 - Job creation and economic opportunities are fully described in Section 11 of the ES and specifically in Sections 11.1, 11.2 and 11.6.

NPPG6 - Both the local authority and RES have complied with the requirement to make positive provision for renewable energy development (via the Wind Energy Policy Guidance) and to follow such guidance in selecting sites. NPPG6 recognises that in the immediate future most renewable energy development will be onshore wind.

By following a rigorous EIA and design procedure, RES has ensured that the proposal is consistent with the para 21 requirement to avoid significant adverse impacts.

There is no reason to believe that the development would have a significant long-term detrimental impact on the amenity of people living nearby therefore there is no conflict with para 22 - respondents fail to distinguish the difference with changing the view from a residence and reducing the residential amenity to an unacceptable level. It cannot in any way be argued cogently that the wind farm will do the latter.

In terms of the appropriateness of the location and scale of development we again point to adherence to the Wind Farm Policy Guidance and to the rigour of the EIA and design procedure.

NPPG14 and 15 - The natural environment has been fully protected by the adoption of the EIA approach. Only visual effects are assessed as being significant (and even then it is subjective as to whether they are positive or adverse) and these are confined

to the 25 year life of the wind farm. The alternative of continuing to rely upon fossil or nuclear resources leaves far longer-lasting environmental impacts.

RES has via the EIA process identified and avoided natural heritage conflicts - these are fully reported in the EIS. See Section 5 and specifically Section 5.7.7 of the EIS where no significant ecological effects are predicted. Some respondents ignore this important information.

Tourism is again mentioned - we deal with this point later.

National Guidance Flawed

What is said by respondents is irrelevant to the planning determination. Nevertheless we would wish to record:

- the need for renewable energy is based on the clear conclusion that climate change is occurring as a direct result of human activity and that the effects of that climate change are significant and adverse
- the Scottish Executive, rather than Westminster, is setting challenging targets for renewable energy for Scotland firstly because of an abundant renewable resource but secondly because of the attendant opportunities for economic prosperity
- the Royal Academy of Engineers' report has been authored not by renewable energy or utility network experts but largely by consultants to the nuclear industry
- respondents confuse the cost and value of wind energy - costs are comparable with lowest cost conventional supplies whereas value, due to avoided environmental damage, is considerably higher

Lack of Adequate Strategy

The representations address national and local strategies. It is implied that such strategies are lacking. This is far from the case as witnessed by:

- a national strategy to attain sufficient renewable generation to meet at least 18% of Scottish electrical demand by 2010 (and consultation has recently closed on increasing the target to 40% for 2020)
- a requirement via PAN 45 and NPPG 6 for local authorities to develop local strategies to make positive provision for renewable energy within their development plans
- the development of Moray Council's Wind Farm Policy Guidance which gives clear locational signals and criteria for assessment of planning applications
- the development of national advice by SNH on both the preferred locations for wind farms and on detailed design criteria
- the development by the transmission utilities of network upgrade plans to accommodate renewable energy

- the establishment by Scottish Enterprise and the Scottish Executive of an Intermediary Energy Technology Institute to ensure that Scotland derives as much economic benefit from the future renewables market as possible (this is paralleled by the establishment in Aberdeen by DTI of Renewables UK to ensure maximum immediate benefit is also derived)

In a free-market economy, it is hard to see how national and regional strategy could develop further in a significant way. These issues are of course irrelevant to the determination of the specific planning application for Drummuir.

Further Research/Public Inquiry Required

Respondents mention the need for further information. The reference lists in the EIS point towards extensive background information which is readily accessed.

On the highlighted issues of tourism and house values (the latter of which is technically irrelevant to the current planning application), some new professionally undertaken studies have recently reported. A study of actual tourism impact in the Schleswig-Holstein region of Germany where there is both an important tourism economy and extensive wind turbine development has shown no adverse impact. Meanwhile a study of impact on house values at 22 wind farms in the USA has shown no reduction in property values as a result of having a neighbouring wind farm. RES can provide copies of both studies, neither of which was published at the time of planning submission.

Respondents perhaps are unaware that public inquiry would mean the planning application being determined by the Scottish Executive rather than by Moray Council.

RES does not dispute the need for an informed determination being made following public review and debate of relevant planning-related issues. RES is therefore comfortable with the proposal for a public hearing, a possibility which planning officials have already raised.

Environmental Assessment

ES Section 1.3

1.3.3 untrue - completely misunderstands that the aim of renewables is displacement/replacement of polluting generation, not addition to them.

1.3.4 untrue - payback is 3-5 months. In addition we propose to use on site borrow pits to minimise the need for transportation of road stone from local quarries.

1.3.4 of the EIS clearly states 94% of the materials used in constructing a wind turbine (excluding the foundation) can be recycled.

ES Section 1.4

1.4.5 incomplete understanding - ignores the fact that the mechanism creates an economic and employment opportunity that the Scottish Executive/Parliament wishes to maximise - there is a major appreciation of this in the context of the North East of Scotland. Renewables UK, that branch of the DTI devoted to maximising UK content in renewables projects, has recently established its UK

base in Aberdeen, on 12 December the First Minister Jack McConnell announced the creation of the Intermediary Energy Technology Institute in Aberdeen – this Scottish institute will spend £15m/year largely in developing and commercialising renewables technology and additionally a major ‘oil to renewables’ diversification annual conference, ‘All Energy Futures’ has found a home in the North East. These are but a few examples.

ES Section 1.5

1.5 misunderstands - there is no large scale hydro potential left to exploit in Scotland and mini hydro has poor economics and limited potential this section totally ignores the environmental imperative of developing renewables.

ES Section 1.6

1.6 untrue - where the resource is available and constraints lacking, development is happening. Developers are considering Scotland, England and Wales for wind farm projects.

ES Section 1.7

misrepresents the surveys quoted.

ES Section 1.9

untrue - there was extensive press coverage at an early stage in both the Northern Scot and the Press and Journal, two papers with very high readership penetration. The exhibitions were held during the day and into the evening i.e. until 7 or 8pm on 3 different evenings of the week specifically so working people could attend.

The stakeholder committee was set up with the declared aim of bypassing the organised anti-wind farm lobby and concentrating on those most affected by the scheme and those organisations that already represented the local population - Strathisla Community Council, Drummuir Community Association and Boharm Community Association were all contacted and it was these respective organisations which proposed membership, not RES. We contend the committee, whilst not being perfect, has been a significant success. We would note that since the committee has been expanded at the insistence of vocal objectors, other members of the committee who are very long standing members of the community have been intimidated into not expressing opinions at our meetings. This is exactly why we wished to avoid the type of open public meeting that is advocated here. Being vocal and articulate does not confer any right to claim a public mandate, and we regret that the more reserved wider population is no longer able to voice its opinions.

ES Section 4.0

The turbines at Drummuir would be sited in a landscape that is far from natural - extensive evidence of man's current and historical use of the countryside for agriculture, forestry, housing infrastructure and industry. Wind farming is by its nature an activity that particularly lends itself to such an environment.

In the environmental statement the significance of the visual impacts are assessed but no view is offered on whether they will be adverse or positive since visual

appreciation is very subjective. However, on no account should it be assumed that these impacts will be detrimental - in public attitude surveys a significant majority of the population consistently react positively to the appearance of wind turbines with descriptions such as "fascinating" and "sculptural" being more likely descriptions than anything adverse. If there is a presumption that effects are adverse and significant then it is important to moderate the interpretation of the significance since many people will definitely view the effects to be positive.

4.4.2 Glens of Foudland is approximately 27km away from Drummuir and is not within the 25km study area. It was agreed with SNH and Moray Council at our scoping meeting on 19th July 2001 that we did not need to consider Glens of Foudland. Laura Campbells e-mail of 17th December 2002 also notes that SNH believes that we do not need any additional information to assess the landscape and visual impacts of the proposal at Drummuir. As they have the EIS for Glens of Foudland and can assess the likely cumulative impacts from that, the Drummuir EIS and their own expertise.

4.4.5.2 Agricultural Foothills

The baseline landscape assessment addresses sensitivity of landscape to change not visual amenity, and therefore not visual receptors. Omission of receptors noted, however assessment aims to classify broad range of receptor types rather than list every footpath, bridleway etc in the area (see 4.6.3 below).

4.4.5.3 Coast

The baseline landscape assessment addresses sensitivity of landscape to change not visual amenity, and therefore not visual receptors.

4.4.5.5 Coastal Plain

The baseline landscape assessment addresses sensitivity of landscape to change not visual amenity, and therefore not visual receptors.

4.5.1.3 Coast

Typo in table – should be high as in text

High sensitivity and negligible magnitude considered to be minor effect on coast landscape type because distances of 14km, eastern part has very limited visibility and views from coastal locations tend to be most dramatic and focused out to sea.

The matrix in table 4.2 is a useful tool for assessment of landscape and visual effects, however it should not be used a prescriptive tool, and the methodology and analysis of potential effects at any particular location must make allowance for the exercise of professional judgement. Thus in some instances a particular parameter may be considered as having a determining effect on the analysis.

Willing to concede to a slight magnitude of change, but even with this the effect on the coast landscape would be no more than moderate/minor, which does not constitute a significant effect.

AGLV2

The matrix in table 4.2 is a useful tool for assessment of landscape and visual effects, however it should not be used a prescriptive tool, and the methodology and analysis of potential effects at any particular location must make allowance for the exercise of professional judgement. Thus in some instances a particular parameter may be considered as having a determining effect on the analysis.

The assessment in the ES states that the visibility in AGLV2 starts at approximately 21km from the proposed wind farm. Most of the land area of the areas of visibility shown on the ZVI are afforested (e.g. Hill of Wangie) and thus actual views of the development from the ground in forested areas will be substantially less than shown on the ZVI. It was therefore concluded that at such distances in afforested areas, the effects on the AGLV would be minor.

AGLV4

The matrix in table 4.2 is a useful tool for assessment of landscape and visual effects, however it should not be used a prescriptive tool, and the methodology and analysis of potential effects at any particular location must make allowance for the exercise of professional judgement. Thus in some instances a particular parameter may be considered as having a determining effect on the analysis.

The assessment in the ES argued that there is only one small patch of visibility of 1-10 turbines at distances of approximately 19.5km in this AGLV. The vast majority of the land area of the designation has no visibility of the proposed development. It was therefore concluded that at such distances, effects on the AGLV would be minor.

4.6.1 It was originally agreed with SNH and Moray Council in July 2001 that we did not need to model Glens of Foudland in the cumulative assessment.

4.6.2.1 We consider the description in the EIS to be an objective description of the extent of visibility within 7km of the proposed development, and that it does not understate turbine visibility. The second paragraph clearly states that ‘it can be seen from the ZVI that the majority of the land area within 7km of the proposed development has some visibility of the turbines’. This is the case and it is acknowledged in the ES text. The text also states that there are areas where there is no visibility of the turbines, which is required to provide a balanced description.

The description of areas where there is visibility of turbines does not attempt to list every hill, valley, settlement, road etc which has visibility, as this is provided graphically in the ZVI map. Although, the author’s additional areas of visibility of 16-21 turbines are valid, the ZVI description is intended to provide a summary of some of the main areas (as stated in the text) of visibility within 7km rather than an exhaustive list. The EIS text provides 2 A4 pages of description of areas of visibility within 7km. This was considered sufficient to support the ZVI map.

4.6.3 Receptors

The emphasis of the description of receptors on the ZVI includes settlements, main roads, railways and public footpaths. Although tourists are a valid receptor to views of the proposed development, it is considered that they are a less sensitive

receptor than residents who experience the visual amenity of the area over long periods of time as their primary place of residence. There is no intention to understate the effects on visual amenity, by not specifically mentioning tourists or any other receptor group.

4.6.3.1 The emphasis of the description of settlement receptors tends to focus on the main centres of population rather than smaller villages or individual properties. The author's list of smaller rural settlements is valid and a table of smaller properties could legitimately be included in the LVA text.

4.6.3.3 Omission acknowledged. However Section 4.4.1.4 of the EIS mentions the restored Keith to Dufftown railway. It should not be assumed that visitors/recreation users will regard the wind farm negatively - this is not the case. We consider that the wind farm could be viewed positively by many viewers.

4.6.4 See 4.6.1 above.

4.6.5 This highlights the problem with photocopying original figures in the production of paper copies of EISs. However we produce wireline images to go with all photomontages to clearly show the turbines in the EIS.

Viewpoints were selected and photographs were taken well before the final layout was designed so it is not possible for us to "line up" turbines and other vertical features even if we wanted to. We take exception to this allegation.

The cumulative viewpoints selected and agreed with SNH and Moray Council show that the wind farms are considerable distances away from the viewpoints and often the turbines will appear as very small features indeed. In an attempt to show the locations of the wind farms clearly we drew on brackets above each wind farm and clearly named each wind farm.

An error has been identified with Viewpoint 3 Figure 4.10. However it is the opposite of Ms Walters argument. In fact the photograph has been enlarged by mistake. The wireline as shown in Figure 4.10 of the EIS is correct and as it is the wireline which shows visual impact of the turbines the assessment is unchanged.

The wind turbines themselves are the main visual part of a wind farm and are therefore the subject of photomontages. Tracks would mainly only be visible when viewed from viewpoints looking across or down onto the site. We do not consider it necessary to model temporary structures in photomontages such as the 5 temporary met masts. The route of the grid is the subject of a separate S.37 application, so we do not consider it reasonable to model it for the wind farm application.

4.6.5.3 Viewpoint 3: Southern Edge of Keith 17 turbines visible at 5.5km. In relation to the horizontal angle and the stability of the design achieved through optimisation it was considered that the effects were moderate from this location. It is noted as a borderline call between moderate and major/moderate.

4.6.5.4 Viewpoint 4: West Edge of Dufftown in Park Area. Typo noted

4.6.5.5 Viewpoint 5: Charlestown of Aberlour. 14 turbines visible at 9.3km. In relation to the number of turbines, distance over which turbines are visible and screening effects of vegetation in the foreground, it was considered that the effects on residents were moderate. In relation to the number of turbines, distance over which turbines visible, screening effects of vegetation in the foreground and duration of the view on this section of road, it was considered that the effects on road users were minor/moderate.

4.7 Summary. Discussion above follows through to the summary of effects.

4.8 Conclusions. Discussion above follows through to the conclusions.

Section 8.0

8.3.1 Conceded that it is 59 return journeys. However 12.3% is still a negligible increase according to the DoT Manual so this does not change our assessment of effects. Any increase in traffic movements is temporary and only associated with the construction phase. Once operational the traffic associated with a wind farm is minimal.

8.3.2 Traffic management measures would be implemented as described in Section 8.3.2 of the EIS. RES have successfully constructed many wind farms and RES, wind turbine manufacturers and specialist haulage companies have considerable experience of managing such movements.

8.3.3.4 Once turbine components are delivered low loader trailers can be collapsed down to reduce their overall length so on return journeys they are not as long. Traffic management as detailed in Section 8.3.2 of the EIS would be implemented to minimise disturbance and ensure road safety.

ES Section 10

Rosemarkie transmitter is not included since no interference to users is expected. Again misrepresents what we mean by 'mitigation'.

ES Section 11

11.1.1 untrue claims - we stand by our own statements.

11.1.3 jobs are arriving in Scotland and it is up to Moray industry to go looking for them - other parts of the country most certainly are. See Section 11.1.3 of the EIS e.g. Turbine manufacturing facility in South Kintyre, Turbine blade manufacturing plant in Kirkcaldy Fife.

Hold-ups on roads - a curious conclusion to be drawn, not warranted by facts and ignores the basic fact that roads are there to be used for transportation - that's what infrastructure is there for - to serve a need: we have such a need.

11.2.2 untrue - this totally misunderstands how 'power station' rates are reimbursed - they are handled in a special way that is not based upon the more general business rate distribution formulae.

11.3.2 we stand by what we say on tourism and find the MORI poll definitive in confirming the positive impacts of wind farms on tourist interests.

Inadequate/Misleading Consultation and Publicity

Respondents criticise the membership of the Stakeholder Committee which RES established to help inform and influence the evolution of the proposal. Membership was drawn from:

- Strathisla Community Council
- Drummuir Community Association
- Boharm Community Association
- Drummuir 21
- Closest Neighbours
- Rural Environment Action Project
- Ecolink

RES and Drummuir Estate were also clearly involved. RES maintains this coverage ensured that a representative cross section of the community was involved in the project as it developed. Any desire to extend the membership had to be balanced against the effectiveness of the committee - we stress that the Stakeholder Committee was never designed to be a regular public meeting, the intention was to have effective and productive discussions.

At the time of submission of the planning application RES undertook a substantial public awareness campaign, including distribution of a six page newsletter to over 4000 homes.

Public meetings are mentioned by respondents. It is RES policy not to organise public meetings to promote its wind farm proposals. Experience shows that such meetings are frequently 'hijacked' by vocal minority interests and that rational discussion with others becomes impossible. Public exhibitions are a much better forum for one-to-one discussions addressing the issues concerning individual people and we believe that in our exhibitions in Mulben, Keith, Dufftown and Drummuir we spoke to in the region of 400 individuals.

The results of a straw-poll survey that we conducted at the exhibitions have already been passed to the Council and the results show substantial majority support for wind energy in Moray, for the site selection of Drummuir and for the design proposed by RES.

Respondents mention that the only open public meeting was one that was independently organised in Dufftown. This in fact was a meeting advertised as an opposition event at which the presentation time afforded to a wind-farm opposition activist, who said little about the actual proposal, was three times that afforded to RES to describe the proposal! Opponents have subsequently portrayed this meeting as being reflective of general public feeling. There is no justification for making this claim for a self-selecting grouping.

A number of statements have been grouped together in the summary of representations under "other consultation/publicity concerns". We do not believe that any of these require a specific response, other than to note that several criticise the statutory planning process rather than the proposal and also that RES has recently lodged an extensive complaint with the ASA regarding material distributed by an opposition activist (see below).

Public Opposition

The Scottish Executive public attitudes survey was clearly very positive and to claim that the "informed" public in Scotland are actually opposed is arrogant.

We are concerned with the vote taken under the auspices of the Strathisla Community Council at Mulben. It is clear that the community and the community council were split on the issue and that opposition from the Mulben and Auchindachy areas is in contrast to the support from Drummuir/Botriphnie.

Although sections of the Mulben and Auchindachy population have treated RES with some scepticism and have not been receptive to wind farm opposition, we are concerned with the nature and influence of anti-wind farm campaign literature.

RES has lodged an extensive complaint with the Advertising Standards Authority regarding material distributed by an opposition activist and we await an adjudication. In the meantime we note with concern that the said activist was allowed to address meetings organised by Strathisla Community Council ahead of its submission to the Council. RES was not invited to address this meeting.

RES believes that the extent of opposition to the wind farm, particularly in the Auchindachy and Mulben areas has to a substantial degree been as a result of misleading information distributed by the anti-wind farm lobby.

Adverse Visual Impact

Size and Height

Wind turbines by their nature need to be exposed to strong and open wind in order to produce electricity for the consumer at lowest cost. This explains the tendency for upland sites to be chosen for wind farms in Scotland and explains the move into the sea at shallow inshore site in England. Turbines also need to be relatively large to produce affordable and meaningful amounts of energy.

Notwithstanding this, we and our landscape consultants fully recognise the need to ensure that our developments sit harmoniously with the landscape and provide pleasing views.

Our design aim is not to hide the turbines, as some of the respondents would seem to wish us to do.

We maintain that the size and height of the turbines are not incongruous with the scale of the local landscape and that from a residential perspective the separations from

neighbouring properties is sufficient to ensure that, although they will undoubtedly be a major visual feature, they will not impact unacceptably on amenity.

In choosing a wind turbine size and wind farm layout there is a trade-off between size and number of turbines. Generally a smaller number of larger turbines is to be preferred to a larger number of smaller machines and this issue was discussed with the local stakeholder committee in deciding on 2MW machines rather than smaller turbines of nominal 1.3MW rating.

Extent of Visual Impact

It is claimed that the turbines would be seen for over 30 miles - this is open to some misinterpretation. At 30 miles the turbines would appear under 1.5mm in height at arms length. Also crystal clear visibility would be required.

The wind farm would not sterilise the land - indeed farming and recreational uses of the site will continue unaffected by the operation of the scheme.

As is often the case the ZVI maps contained within the EIS have been misinterpreted - they do not indicate in any way the scale of visual effect - they merely indicate with unobstructed visibility where the turbines might be visible.

Respondents use the terms visibility and visual amenity interchangeably which is fundamentally wrong.

Although the development overlooks a number of small rural settlements and isolated properties, it is important to understand the above difference and furthermore if it is judged that visual amenity is being affected, then the magnitude and hence significance of that change is important and must be balanced against wider considerations of the magnitude and significance of the wind farm's environmental benefits.

We also reiterate that in public opinion surveys, the majority of people find wind turbines to be pleasing to the eye.

Our professional landscape consultants, even where the wind farm has been judged to be creating changes of major significance to views, do not advise us that they will dominate the landscape.

We stress that changes to views or visual amenity are not reason in themselves to refuse the application. The assessment simply feeds into the balance of judgement that has to be struck in determining whether the benefits of the scheme outweigh any perceived adverse effects.

Any perceived loss of visual amenity would be to a relatively small number of people compared with the many thousands who would benefit from clean electricity as a result of the wind farm.

Nature of Visual Impact

Although Moray has some fine scenery, it is of a nature that is well able to accommodate wind farm development. This is reflected in various SNH documents

and indeed in Moray Council's Wind Energy Policy Guidance. RES has a policy of not selecting sites which conflict with national designations be they for scenic or ecological or other environmental qualities. Moray does not have a preponderance of sites with such accolades.

Respondents use a variety of emotive descriptions which deserve to be challenged. The use of the words "industrial scrap-yard" and "blight" in the current context are highly subjective and can be countered by equally emotive but positive language. We see little point in providing specific retorts to such submissions.

Cumulative Impact

Respondents correctly identify sites that are at various stages of development by a number of companies, all of whom are of long-standing pedigree and are of good reputation. It is a major step to assume that the schemes will inevitably give rise to unacceptable cumulative impact.

RES and Moray Council have already discussed what procedures should be adopted in requiring cumulative assessments taking into account the sequential nature of applications and their differing gestations.

Comments by respondents again fall into the category of containing a lot of emotive language and subjective opinion, but little objective evidence.

Restoration

The EIS is quite clear in our intention to leave the turbine bases, bar the central plinths, in-situ following decommissioning. Our view is that this will be more acceptable environmentally than the alternative of removing them (although we could of course do so if required).

We would expect the council to require us to enter into a Section 75 agreement to guarantee restoration and there are a number of financial mechanisms that would meet this objective.

Impact on Flora and Fauna

All of the representations make statements of effect without commenting upon the sensitivity of the aspect affected, the magnitude of the expected change and hence the level of the overall significance.

The EIS fully addresses the issues raised and it is not clear whether the respondents have either not read the EIS or disagree with the assessments. We stress that eminent, experienced and qualified consultants have been used for our ecological and ornithological studies and that the EIA and design process has ensured that there will be no impacts on such interests at a level that is significant under environmental legislation.

Noise

We have been misrepresented in any correspondence that suggests that RES staff have "reluctantly admitted that turbines would be audible at over 2 miles away".

Turbines do not produce percussive sound - the respondent is confusing modern turbines with certain designs of the 1980s which had rotors 'downwind' of the tower.

Having escorted many visitors to the Dun Law wind farm in the Scottish Borders, most people are surprised at how quite modern turbines are - we have yet to escort someone to a wind farm who has described the machines as noisy.

None of the respondents challenge the noise assessment contained within the EIS. The conclusion is that noise levels at neighbouring properties will be well within relevant guidance levels.

Roads

A full description of road widening and heavy/long vehicle access is given in the EIS. None of the respondents challenge in detail what is said and the conclusions drawn.

It is claimed that Moray residents would bear the cost of road damage. This is untrue - maintenance of the trunk road network is the responsibility of the Scottish Executive whilst in terms of the minor road network RES has undertaken to do a condition survey and to restore the road to that condition post-construction, see Section 8.5.2 of the EIS.

Effect on Access

A respondent claims that people will not wish to walk the moors once the wind farm is built. This does not concur with evidence elsewhere. Additionally, RES is in discussion with representatives of Drummuir 21 to look at how the wind farm tracks could link with the existing recreational track network in the area - the wind farm is very much being seen as an opportunity.

Threat to Aircraft

No air interests registered any concerns when RES consulted them during the screening and design stages. Recently the CAA planning application consultation response came through (Dec 02 and Jan 03) and again they have no concerns over the Drummuir Estate wind farm.

We can assure the respondent that MOD is in no way reluctant to register objections to wind farms. There are many cases on record of objections being registered elsewhere and indeed MoD, due to the UK and Scotland in particular having internationally very unusual and extensive low fly zones, is regarded by DTI as one of the major barriers to wind farm development nation-wide.

Impact on Private Water Supply

RES has carried out a hydrological survey sufficient for the purposes of the planning application. This concludes that private water supplies are not at risk nor will they be affected during construction or operation of the wind farm (see Section 7.6.2.5 and 7.6.3.3 of the EIS).

We would be happy to be bound by condition or agreement to guarantee the integrity of supplies to dwellings currently served by private supply.

Adverse Impact on Property Values

We stress that property values is not a pertinent planning consideration.

Nevertheless, despite the existence of 70+ wind farms and wind clusters in the UK there is no general evidence to suggest that the presence of the wind farm has had a significant effect.

A recent study from the US points out the difficulty in making an assessment of impact on property value because of vested interests of estate agents, property owners and indeed wind farm developers. The study has drawn upon tax assessors valuations and has concentrated on properties with clear views of neighbouring wind farms. The researchers have found no meaningful impact.

At exhibition and at public forum it has become quite clear to RES that the major motivating factor for opposing the wind farm proposal has been fears over property values. This is perfectly understandable but is untenable both in terms of lack of evidence and also in terms of planning pertinence.

Adverse Impact on Tourism

There is extensive representation on this issue. Recent reports are cited commissioned respectively by the wind industry and Visit Scotland. We believe your respondents derive somewhat peculiar interpretations from the results and we suggest that the Council should study these documents independently. Our own reading of the reports is that wind energy developments generally portray a positive impression of an area and offer some tourism potential. Schemes however do need to be sited away from areas which are of national scenic importance. Drummuir is not in such an area. Although Speyside is extremely pleasant, the area between Keith and Dufftown is very much a working environment and there is little that does not show the intervention of mankind - be it through agriculture, forestry, housing or industry.

RES maintains through experience elsewhere that there is every reason to believe that the Drummuir wind farm, being within stopping-off distance of the Speyside Way and the Whisky Trail would add to the visitor experience. In the wind industry commissioned 2002 MORI poll in Argyll more than five times as many visitors said that wind farms for them created a positive visitor impression than those who said otherwise. The 2002 Visit Scotland survey showed that positive impacts of wind farms included enhancing "the reputation of Scotland as an environmentally place to visit" whilst wind farms could be "tourist attractions in their own right". Most respondents believed that as long as wind farms were sited sensitively i.e. outwith

designated national parks or national nature reserves then wind farms should have "few negative impacts on tourists or tourism businesses". A third survey in 2001, this time by the Institute for Tourism and Recreation Research in Northern Europe in the densely wind-turbine populated Schleswig-Holstein region showed that bed-rate utilisation had been unaffected by the widespread development of wind farms and clusters.

We have difficulty addressing specific comments by respondents, but we would again observe that much of what is said falls into the category of opinion rather than fact and is not supported by experience elsewhere. Other comments, as suggested above, put surprising interpretations on what we regard as generally positive research. A number of comments are of the anecdotal, third-party variety and are of questionable derivation - for it to be claimed that people from Holland and Denmark are opposed to wind development may be true at the level of the odd individual, but we have a certain scepticism against such views being a generality.

Impact on Television Reception

Television is the only service that is likely to be affected by the wind farm and the EIS describes the nature, likely extent and remediation of the problem.

We would expect our undertaking to restore services to be formalised by the Council by condition and/or Section 75 planning agreement.

Better Alternatives

RES accepts that in the future there may well be better clean energy alternatives to onshore wind, but for now there is no other technology that can provide electricity as cheaply, as reliably and in such significant amounts. The Scottish Executive's 2001 renewable energy resource study of Scotland identifies significant offshore wind, tidal stream and wave resources but comments that until the technologies to harness them are more fully evolved, it will be onshore wind that will dominate the market. This is reflected in national energy and planning policies (NPPG6 for instance).

We fully endorse the need for energy efficiency and the need and opportunities presented to Scotland for the development of new renewables technologies. What we believe your respondent miss is that the need for energy efficiency and new renewables are not alternatives to development of wind farms - they are complementary requirements. If carbon dioxide emissions are to be reduced to sustainable levels (60% reductions have been suggested by the Royal Commission on Environmental Pollution) then there is no simple and single solution and it is important to realise that what can be done today with today's technology must be done. This is well recognised by government.

Surplus of Electricity/Renewables Targets Exceeded

Respondents generally misrepresent or misunderstand UK and Scottish government targets related to renewables. Additionally many of the comments are of a political nature. There is nothing in the representations which is competent and pertinent to the current planning application - the comments relate to wider policy and to large degree

are redundant since the parliaments have already considered the issues raised and have put in place clear policies that will guide and promote renewables developments until 2010. Respondents fail to understand that it is not the job of a local authority to rewrite national policy.

Nevertheless, we offer the following statements in response to points made:

- excess capacity is desirable in a power supply system to ensure that supplies are guaranteed in the event of unavailability of output from specific plants - recently both reactors at Torness were out of commission for an extended period and the lights did not go out because of reserve capacity
- renewables are being promoted not to add to excess capacity but to initially displace output from fossil-fired stations (by reducing the amount of energy they are required to create and hence the amount of fuel they need to burn) and ultimately to avoid the need to replace them when they are due to be decommissioned
- although Scotland has over capacity now, progressively over the next 30 years all thermal (fossil and nuclear) power stations currently on-line in Scotland will reach the end of their lives - Scotland will slowly become a net importer unless new plant is constructed
- the Scottish Executive sees tremendous economic and employment opportunities by building a renewable energy market and industry - hence more vigorous Scottish targets are being suggested for 2020
- although the overall UK target for renewables supplies is 10% by 2010, the corresponding figure for Scotland is 18%, this being due to the 'head-start' afforded by the hydro-electric schemes of the 1950s

Wind Energy Ineffective

Respondents' statements reflect basic misunderstandings of wind turbine technology. We address specific claims below, but point out once again that nothing that is said has any relevance or pertinence to the planning process.

Respondents confuse efficiency and capacity factor.

Efficiency is a measure of power out to power in - for wind turbines the maximum theoretical efficiency is 59.2% (the wind must have sufficient energy left to move the air away). Modern turbines typically achieve 80% of this figure. It should be noted that thermal cycles tend only to be 30% efficient.

Capacity factor is the ratio of mean average power output to turbine power rating - for wind turbines this is typically 35%. Nuclear and fossil plant achieve higher figures, typically 70% due to the controllability of the fuel source.

A third ratio is capacity credit - that is the amount of power as a percentage of rating that can be relied upon to be available at times of maximum demand compared to rating - for wind turbines there is evidence that this figure is in the 30 to 50% range due to the correlation of wind speed to demand.

Our EIS is quite clear in terms of energy delivery and CO2 saving - our figures are most definitely not based on running at 100% of rating, see Appendix 1 of EIS i.e. 30% used.

Respondents use out-of-date data - in the UK, wind turbines currently account for about 0.4% of electricity supply. In Scotland the figure is about 1.4% and will rise to at least 3% by the end of 2003.

The Royal Academy of Engineers report is mentioned - we reiterate that this report was not authored by a competent renewable energy or network authority and had a preponderance of nuclear interests. The report totally ignored extensive capacity credit evidence, both real and research based.

The need for back-up is not specific to wind - all plant requires back-up at least equal to its rating, although that reserve capacity can be shared.

Turbines do not attract capital subsidy nor indeed is there a direct subsidy of £30/MWh produced. There is a market mechanism requiring suppliers to source ever-increasing proportions of renewables for their portfolio and failure attracts a £30/MWh fine. The added value that this confers to renewable schemes is fully dependent upon market forces.

It is totally untrue to suggest that Denmark and Holland are "getting rid of wind farms as uneconomic and ineffective". These statements, as do many others in the respondents' responses, derive from Country Guardian - a national single-issue anti-wind farm lobby group. The Danish Minister for Economic Affairs, Bendt Bandtsen wrote to the Sunday Telegraph on 10 March 2002 refuting such misrepresentation and made the point that the economics of wind had improved to such a degree that it could be exposed to full market conditions without subsidy. It was also expected that by the end of 2003 renewables, mostly wind, were likely to account for 27% of Danish electricity supply.

Will not Lead to Reduction of Emissions

The claims made by respondents do have pertinence to the planning process to the extent that the scheme proposal is a direct result of environmental policy to reduce greenhouse gas emissions. The carbon dioxide savings potential of the wind farm are a key justification for it and if the claims made by RES in the EIS regarding the background policy and the scale of the benefits are false then the weight afforded should be varied accordingly.

A number of respondents suggest the wind farm would produce unacceptable levels of CO2 during construction. We totally refute this. As we mention in the EIS, the energy (and therefore CO2) payback of the wind farm would be as short as 3 to 5 months.

Reduction of energy demand is suggested by respondents as a more important priority than development of wind farms. This suggests that respondents are content that we continue to serve a reduced demand using polluting energy sources. We, in line with government, contend that energy reduction and energy generation policies are complementary not alternatives.

We fail to understand why reduction of afforestation should be seen as a reason not to develop wind farms - surely it makes them all the more important.

Our CO₂ savings predictions are based upon fair assumptions regarding energy output, not working at 100% rating continuously as implied by a respondent - the data are clearly stated in Appendix 1 of the EIS.

It is claimed that wind farms do nothing to achieve Kyoto CO₂ reduction targets - in fact in a Moray context the Drummuir wind farm alone will displace sufficient CO₂ to meet half the region's per-capita share of the reduction targets set for the UK by the Kyoto Agreement.

We fail to understand the relevance of bovine digestive gaseous emissions as a reason not to build the wind farm.

Agenda 21 identifies that global solutions to the issues inter-alia of global warming can only be achieved through local level initiatives - the Drummuir wind farm is one such manifestation and at a local level will have a very significant part to play in Moray's overall contribution to global environmental action.

Limitations of Grid

There are indeed grid limitations and although Drummuir is unlikely to be affected by these, future developments will be dependent upon grid modification and/or additional constraining policies on polluting energy sources.

An indicative grid connection has been described in the EIS. The actual consenting of the connection is running in parallel with the wind farm consenting, albeit following a different procedure and with a slight time-lag.

Clearly without a grid connection, the wind farm cannot be operated and therefore would not be constructed until that connection were approved.

No Local Benefit

Local benefits are described in Section 11.2 of the EIS.

Respondents who claim that there will be no local benefits have clearly not read the relevant chapters. (Lease payments to the estate will be recycled locally and will improve the estate fabric. Local employment will be generated during construction etc).

RES continues to talk to its stakeholder committee regarding community benefits and meetings have been held to discuss footpath linkage, community investment and community funds.

It is claimed by many respondents that Moray doesn't need the wind farm - they should be in England where the demand is. We have said before that Moray currently imports all of its electricity, and by the same argument those locations which currently

host the power stations should take the attitude that they should stop supplying Moray.

We reiterate that creation of wind farms is designed to displace/replace conventional power stations with clean generation - the argument about meeting increasing demand in England is fatuous.

We are described by a respondent as being foreign - the respondent has clearly not researched the history and Scottish pedigree of the Sir Robert McAlpine Group, and is apparently unaware of the recent expansion of RES's Scottish office in Glasgow.

Impact on Riding Club

We have reassured riding interests that the Drummuir wind farm and its track network would provide increased opportunity, not threat, to the use of the location for equestrian recreation.

Community Fund

We are aware that the community fund will be perceived by some as a bribe, but such views would appear to be very much in the minority. At stakeholder meetings RES has discussed on several occasions how best to ensure ongoing and non-discriminatory community benefit. A community fund is seen as the most appropriate vehicle.

Other Comments

Much of what is said is not specific to the Drummuir proposal far less being relevant to planning.

We hope this adequately addresses all the objections raised. Please do not hesitate to contact us if you require further information.

APPENDIX 6C

List of parties making objections/representations
against amended proposals, summary of
issues raised with planning officer comment

Objections/representations on the amended submission were received from;

- Mike and Fran Higgins, Cranna House, Mulben, Keith AB55 6XL
- Mrs J Petrie, Hollybank, Mulben, Keith AB55 6XP
- Mr D W Smith, 7 Winster Place, Elgin, Moray IV30 4EN
- Miss J C Willis, Deanshaugh Croft, Mulben Keith
- Mr Alan Willis, Deanshaugh Croft, Mulben Keith
- Mrs Jean Stewart, Davieburn House, Drummir, Nr Keith, Banffshire AB55 5QB
- Mr Alastair I MacLennan, Balliefurth, Grantown-on-Spey PH26 3NH
- D. R. Bell, Beech Cottage, Fore Road, Kippen, Stirlingshire FK8 3DT
- Shirley Bell, Beech Cottage, Fore Road, Kippen, Stirlingshire FK8 3DT
- Owner/Occupier, Craigsview, Inchberry, Orton Fochabers
- Catherine Adamson, Arkle House, Mulben AB55 6YX
- Ann MacLennan, Balliefurth, Grantown-on-Spey PH26 3NH
- Owner/Occupier, Corsemaul House, Auchindoul Dufftown
- Claire Evans-Teosh, Carswood Cottage, Spey Bay IV32 7PJ
- P S Munro, The Hedges, Meft Road, Urquhart Elgin IV30 8GG
- Ms D Howard, 20 Gordon Street, Portgordon
- Owner/Occupier, 20 Gordon Street, Portgordon
- Maureen McHardy, 19 Tom-Na-Muidh Road, Dufftown, Keith Banffshire AB55 4AT
- R M McHardy, 19 Tom-Na-Muidh Road, Dufftown, Keith Banffshire AB55 4AT
- Alison J Collie, 80 South College Street, Elgin, Moray IV30 1HA
- Owner/Occupier, Keepers Cottage, Easter Kellas, Elgin IV30 8TW
- Owner/Occupier, Cairnhill Cottage, Grange AB55 6SP
- J Marriott, The Bon, Lein Road, Kingston Moray
- Owner/Occupier, Dwarick, Wester Herricks, Keith Banffshire AB55 5NT
- Owner/Occupier, Dwarick, Wester Herricks, Keith AB55 5NT
- Brian Lawrence, Reidhaven Place, Cullen Moray
- Owner/Occupier, 4 Station Road, Urquhart IV30 8LQ
- B A McCormack, Cabbachs, Mulben, Nr Keith AB55 6YX
- Chris Lancaster, Stripeside Cottage, Grange, Keith AB55 6LH
- Jennifer Smith, Berrybauds, Clochan, Buckie Banffshire AB56 5HX
- David Smith, Berrybauds, Clochan, Buckie Banffshire AB56 5HX
- Jane Brewster, Easter Denoon, Eassie, Forfar Angus
- Sally Hancock, 1 Towiemore Cottages, Drummuir, Keith AB55 5JA
- Mr K Francis, 1 Towiemore Cottages, Drummuir, Keith AB55 5JA
- Ms B Bain, 4 Craighead, Mulben, Moray AB55 6XR
- W Thain, 8 Craighead, Mulben, By Keith AB55 6XR
- Mabel Thain, 8 Craighead, Mulben, Keith AB55 6XR
- Dr Neil Tilston, Mains Of Auchnidachy, Keith AB55 5HT
- Mr T Pinson, 18 Howard Crescent, Mednesford, Cannoch, Staffordshire WS12 4EF
- Mr R Worthington, Shielmuir, Drybridge, Buckie AB56 5JB
- Owner/Occupier, Craighead, Mulben, By Keith
- Jonathan Paul Sharpe, Inkerman Croft, Drybridge, Buckie AB56 5CD

- Mr George C Smith, Redmoss Croft, Drybridge, By Buckie AB56 5JD
- Mr Arran G Smith, Redmoss Croft, Drybridge, By Buckie AB56 5JD
- Petra and John Cortis, School Hill, Drybridge, Buckie AB56 5JD
- Mrs G A Worthington, Shielfmuir, Drybridge, Buckie AB56 5JD
- Mrs N Pinson, 18 Howard Crescent, Mednesford, Cannock, Staffs WS12 4EF
- Mrs Ann Smith, Redmoss Croft, Drybridge Buckie
- Claire Rose Cortis, Inkerman Croft, Drybridge Buckie AB56 5ED
- Ursula and James Walker, 2 Craighead, Mulben, Moray AB55 6XR
- Regan Walters, Mains Of Auchindachy, By Keith AB55 5HT
- David Meeks, Ten Rood, Towiemore, Drummuir, Near Keith AB55 5JA
- Barry M Croshaw, Towieburn, Drummuir
- Alan S Duncan, The Smiddy, Drybridge, Buckie
- Michael Lobban, Reirahmory Coralheid, Auchindachy AB55 5HX
- Mrs R Bunch, Reirahmory Coralheid, Auchindachy AB55 5HX
- Owner/Occupier, Mill Cottage, Wester Chalder, By Keith, Banffshire AB55 5QD
- Sandra Croshaw, Towieburn, Drummuir, Keith AB55 5JA
- Mrs F Green, 10 Craighead, Mulben Keith
- Mrs Clark, Hazelwood, Drummuir, Keith, Banffshire AB55 5JA
- Jennifer McGregor, 2 Towiemore Cottages, Drummuir, Botriphnie, Keith AB55 3JA
- J M Reading, Primrose Cottage, Towiemore, Drummuir, Keith AB55 5JA
- Mrs Vivien M Dillon, BVM&S, MRCVS, Cert SHP, Mill Of Towie Farm, Drummuir, Keith Banffshire AB55 5QD
- Mr Alistair Watt, Coldhome Farm, Keith, Banffshire AB55 5NX
- Claire- Gillian Watt, Coldhome Farm, Keith, Banffshire AB55 5NX
- Agnes Watt, Coldhome Farm, Keith, Banffshire AB55 5NX
- Mrs R L McNair, Tombreck Croft Keith
- R L McNair, Tombreck Croft Keith
- Colin Anderson, 2 Towiemore Cottages, Drummuir, Botriphnie, Keith AB55 3JA
- Mr M Fettes, Mains Of Auchindachy, Keith, Banffshire AB55 5HT
- Mrs S Fettes, Mains Of Auchindachy, Keith, Banffshire AB55 5HT
- Donna Fettes, Mains Of Auchindachy, Keith, Banffshire AB55 5HT
- D G Dillon, Mill Of Towie Farm, Drummuir, Keith, Banffshire AB55 5QD
- J R Graham, Craigsview, Inchberry Moray
- H Morrison, 26 Pinewood Road, Mosstodloch, Fochabers IV32 7JU
- Cath Thomas, Hollcroft, Mulben Keith
- Mr Kevin Fyfe, Ardbrack, Drummuir Keith
- J McIntosh, Wellhill, Braehead, Inchberry, Fochabers IV32 7QH
- M Garrow, 4 The Dominies, Lhanbryde, Elgin IV30 8QZ
- B Robertson, 4A Earl Street, Portgordon Buckie
- Mr W Duff, 84 High Street, Rothes Banffshire
- Barbara H Moir, Auchorties Farm, Keith AB55 5NY
- L Melvin, 35 Deanshaugh Road, Elgin Moray
- J Bruce, Woodside, 41 Linn Brae, Aberlour
- W Craig, 4 Milnefield Avenue, Elgin
- Douglas Grant, 31 New Street, Buckie
- C Gauld , 22 Land Street, Rothes

- R Gauld, 22 Land Street, Rothes
- E McKay, 64 Birnie Place, Mosstodloch Fochabers
- J Johnston, 41 Murrayfield, Fochabers IV32 7EZ
- J P Dear, Treeline, 3 Kynoch Terrace, Keith, Banffshire AB55 5FX
- Di Francis, Hollytree Cottage, Towiemore, Drummuir AB55 5JA
- James W Mair, Auchorties, Keith Moray
- E M McLaren, 63 Mossmill Park, Mosstodloch Fochabers
- Cindy Peden, Drumtenant, Station Road, Lhanbryde Moray IV30 8PY
- Paul Peden, Drumtenant, Station Road, Lhanbryde Moray IV30 8PY
- Phil Thomas, Hollcroft, Mulben Keith
- D J Brown, 13 Elmhurst Drive, Chasetown, Staffs WS7 4YQ
- G I MacPherson, Balnabreich, Mulben Keith
- W R Graham, Craigsview, Inchberry, Orton Moray IV32 7QH

The main point raised were as follows;

Contrary to development plan

- Proposal departs from policy S/ENV1, L/ED10 and L/IMP2.
- Design of turbines and sub-station do not relate to immediate vicinity and compromise design characteristics of surrounding area contrary to policies L/IMP1, L/IMP3.

Comments

This has been dealt with in the response to the original objections.

Contravenes national guidance

- Development does not meet criteria set out in NPPG6.

Comments

This has been dealt with in the response to the original objections.

National guidance flawed

- Recent reports from Royal Academy of Engineers, Institution of Electrical Engineers, Institution of Chemical Engineers and Institution of Civil Engineers State that Government targets for renewable energy are unrealistic and not feasible – these targets form the basis of the planning guidance and advice laid out in NPPG6 and PAN45.

Comments

This has been dealt with in the response to the original objections.

Lack of adequate strategy

- Application one of ten piecemeal applications in area and not part of renewable energy strategy.
- Council requires a strategy to consider the overall capacity of the landscape to accommodate wind farms, the cumulative affect of a number of them on targets for total output.

Comments

This has been dealt with in the response to the original objections.

Further Research/Public Inquiry Required

- Wind farms approved at Cairn Uish and Paul's Hill in Moray with another at Glens of Foudland in Aberdeenshire – others could be passed before one has been built allowing no opportunity to learn from local experience.

Comments

This has been dealt with in the response to the original objections.

Environmental Assessment

- Veracity of much of information provided in EIA is questionable – e.g. RES claims to have the Moray Raptor Society as a consultee but enquiries have so far failed to show that such an organisation exists.
- Information on bird counts is dubious as are claims that site hosts no species enjoying special attention at international level – many protected species have been seen on and around the site.
- Predications on noise are purely hypothetical based on computer models and cannot demonstrate actual noise that will be produced – reports provided using actual wind farms which clearly demonstrate that turbines will be a noise hazard.
- Ecological assessment did not attempt to evaluate impact on migrating birds – no assessment made to determine numbers of birds migrating across the area – only assessment of collision risk to birds made in relation Merlin and the issue is dismissed – non assessment of this issue is an omission as large numbers of geese migrate twice yearly across the area.

Comments

This has been dealt with in the response to the original objections.

Inadequate/misleading consultation and publicity

- Serious irregularities at public exhibitions held last year by RES to inform local people of development – log provided of computer images at exhibitions shows

that about half of the view generated were missing from the log – quite possible that all views missing from log were incorrect – likely that about half the members of public who viewed wire lines at public exhibitions were shown incorrect, smaller, turbines and were misled over the visual impact of the wind farm – imperative that this fully described in report to the Committee.

- Developer used computer model to represent visual impact on separate locations – indicates lack of integrity which must cause scepticism about many of RES statements.
- RES appeared to be attempting to mislead public about size of turbines at public exhibitions because hub heights incorrectly set.
- Leaflets circulated by RES to households in the area does not give true impression of visual impact of wind farm and is misleading.
- RES appear to be trying to discredit the overwhelming vote by Strathisla Community Council against the wind farm.
- Experience of dealing with RES submitting application for wind farm at Arch Hill near Glamis in Angus – first application would have been recommended for refusal but RES withdrew it 12 days before the committee – as a result of Arch Hill environmental statement 2003 being published irregularities have been discovered which may have happened with Drummuir application – RES methods of business leave much to be desired.

Comments

This has been dealt with in the response to the original objections.

Public opposition

- How can RES state that 70% of respondents are happy about development when so many are against it.

Comments

This has been dealt with in the response to the original objections.

Adverse Visual Impact

- The Countryside Act states that every Minister, Government Department and public body shall have regard to the desirability of conserving the natural beauty and amenity of the countryside.
- The cumulative impact of the nearby TV communications mast at Knockmore not included.
- Cumulative effect of AMEC application Clashindarroch – only 10 miles from Drummuir – not included.
- Cumulative effect of 4 sites in Moray will be disastrous on landscape but no consideration of sites at Clashindarroch and Aultmore included in assessment.
- Change to layout has made no difference and if anything has made it worse.
- Joining site to grid will lead to pylons which will have further visual impact.

- Along with other wind farms targeted for area there will be unacceptable industrial build up.
- Visible from Auchindachie, Towiemore, Drummuir, Dufftown, Maggieknockater, Mulben and Keith.
- Trivial changes such as moving turbines does not make proposal any more acceptable than previous design.
- Changes to track layout will not make any significant difference to visibility of wind farm.
- Data provided in amended environmental statement shows increased visibility of wind farm on several road routes.
- RES have changed methodology between original application and amendment – wind farm visibility cropped at both the 25 km radius from wind farm and land/sea interface – wind farms observed in excess of 30 km for instance Novar wind farm is an intrusion when viewed from Culloden.
- On shore wind farms still visible even when viewer is off shore so visibility should not be artificially cropped at coastline.
- If application submitted 3 weeks later, proposal for wind farm at Clashindarroch would have to have been included – Clashindarroch development of 47, 100 m high turbines at elevations in excess of 500 m would have severe impact on landscape penetrating well into Moray.
- Scottish Executive has already breached its own guidelines in PAN45 regarding cumulative impact of wind farms – Drummuir was not considered with the Paul’s Hill and Cairn Uish applications – RES has not included development at Clashindarroch which has been submitted to the Scottish Executive.
- Proposed Aultmore wind farm will also have a significant impact on an area in close proximity to Drummuir, resulting in almost no part of Moray being free from the visibility of turbines.
- Many other proposals in the offing – Carn Kitty, Cairn Dhui, Boyndie and Kildrummie – cumulative impact is acceptable.
- More secluded areas in Scotland that could accommodate wind farms – off shore or in more hidden areas of Scotland’s mountains.
- RES have not taken Towiemore community in to consideration – development will tower over Towiemore.

Comments

This has largely been dealt with in the response to the original objections. The proposed wind farms at Aultmore and Clashindarroch are not part of the cumulative visual impact assessment although an appendix to the amendment of the Environmental Statement shows visual impact information for these developments. At the time of drafting this report an application had not been submitted to the Scottish Executive for Aultmore and whilst an application had just been submitted to the Executive for Clashindarroch it had not been advertised as additional information had been requested.

PAN 45 states that when assessing cumulative effects, it is unreasonable to expect this to extend beyond schemes in the vicinity that have been built, those which have permissions and those that are currently the subject of undetermined applications.

As the proposals for Aultmore and Clashindarroch came forward towards the end of the application period for Drummuir a decision needs to be made as to whether or not it is reasonable to delay the Drummuir application for further amendment to include the. In terms of the guidance in PAN 45 Aultmore had not actually been submitted at the time of this report and the Clashindarroch proposal had only just been submitted.

A similar situation arose towards the end of the period when the Scottish Executive were dealing with the applications for Paul's Hill and Cairn Uish. The Drummuir application was submitted and it had not been included in the cumulative assessment for Paul's Hill and Cairn Uish. This was raised with the Executive who took the view that it would be unreasonable to delay the consideration of the applications especially as the Council would be taking account of the cumulative impact of the proposals for Paul's Hill and Cairn Uish along with Drummuir.

The same approach can be applied to the Drummuir application in relation to Aultmore and Clashindarroch.

Impact on flora and fauna

- Proposal on heather moorland which would destroy a rich habitat and precious Eco system.
- Loss of natural habitat.

Comments

This has been dealt with in the response to the original objections.

Noise

- Disturbance from noise – output from each turbine stated to be 102 dB by Mr Hunter at stakeholder meeting – concerned about aerodynamic noise of blade thump.
- Development will destroy peace and tranquillity of area.

Comments

This has been dealt with in the response to the original objections.

Roads

- Level of construction traffic on tiny access road would be unacceptable.
- Roads leading to site not suitable.
- Construction traffic combined with holiday and local traffic on scenic and inadequate roads will lead to congestion.

Comments

This has been dealt with in the response to the original objections.

Impact on Private Water Supply

- Residents rely on water from springs and excavations, particularly borrow pits, will jeopardise supplies.
- Impact on water supply in area where there is no future plans to install public supply.
- Will adversely affect water supply to Towiemore.

Comments

This has been dealt with in the response to the original objections.

Adverse impact on property values

- Value of houses will be affected.
- Reduction in house values will lead to demand for reduction in Council Tax.
- Development will make it difficult to sell property in vicinity of wind farm.

Comments

This has been dealt with in the response to the original objections.

Adverse impact on tourism

- Adverse affects on tourism – Visit Scotland survey states that 58% of those interviewed said that turbines would spoil the landscape and 26% said they would not return to areas with wind turbine developments – Moray relies heavily on tourism and cannot afford to loose 26% of people who visit the area.

Comments

This has been dealt with in the response to the original objections.

Impact on television reception

- Adverse impact on television reception.

Comments

This has been dealt with in the response to the original objections.

Surplus of electricity

- Scotland already surpasses the 10% renewable energy target set for achieving by the year 2010.

Comments

This has been dealt with in the response to the original objections.

Wind energy ineffective

- If public money being put into wind industry was redirected towards energy efficient building incentives not only would environmental savings result but quality of housing stock would improve, local building industry employment would increase and quality of life would improve.
- Wind power is inefficient and needs another source of energy to back it up.

Comments

This has been dealt with in the response to the original objections.

No local benefit

- Other than derisory £700 per installed megawatt compensation package there are no benefits for Moray or the local community.
- Electricity produced will be delivered to national grid not for use by local houses or businesses – Scotland will become England's industrial area.
- RES employee at exhibition in November 2002 said they were a business and as such had no interest in the views of local people.
- If accepted significant compensation must be made available to local people.

Comments

This has been dealt with in the response to the original objections.

Light Pollution

- Light pollution will be an issue if aircraft warning lights are mandatory on the towers.

Comments

It is not considered that aircraft warning lights would cause light pollution to a level warranting a recommendation of refusal.

Flooding

- Run off from site into Burn of Towie could be horrendous and cause flooding.

Comments

The site is not identified as being within a flood area and SEPA have not raised any concerns about flooding.

APPENDIX 6D

**Applicants response to objections/representations
on amended proposals**

OBJECTIONS TO AMENDED SUBMISSION – APPLICANTS RESPONSE

General

- RES encouraged by relatively small number of representations – 100 in total. Majority take the form of 2 standard letters, accounting for 47 and 25 of the objections – many from outside the immediate area. Only 25 original letters several of which are recognised as coming from persons active in regional or national anti wind farm campaigns.
- Half submissions come from 21 addresses.
- Small number of independent representations sits comfortably with results of survey that RES has recently undertaken within 7 km of site which confirms a high level of support for the scheme.

Contrary to Development Plan

- RES strongly of the view that the development is consistent with the development plan and the wind energy policy guidance which should be afforded considerable weight in the determination of the application.

Contravenes National Guidance

- NPPG6 requires local authorities to make positive provision for wind farms in their development plans as Moray Council has done via its wind energy policy guidance.
- NPPG6 requires individual proposals to be viewed positively unless there is major conflict with those interests typically addressed by environmental assessment – Drummur ES identifies no such conflicts – RES concludes the application is wholly consistent with NPPG6.

National Guidance Flawed

- Misrepresentation of the bodies concerned.
- RAE report did not use the language “hopelessly unrealistic” but did express concern that there are few renewable technologies sufficiently mature for commercial exploitation.
- Report casts doubt on hope that sufficient schemes could be designed, consented, financed and built by 2010 to meet UK renewable target – this must be argument in favour of a more accommodating planning system.
- On 17 August 2003 RAE was quoted as saying the Government was quite right to support wind energy.

Lack of Adequate Strategy

- It is true that the Government has not laid out a detailed route map suggesting how the 2020 target of 40% renewables will be achieved in terms of technologies, timings and locations. RES agrees that such a plan will be useful for the industry for the public and for local authorities.
- To contend the absence of such a plan implies lack of strategy would be false – Scottish Executive has funded national resource assessment, a grid upgrade study and via SNH has identified areas where wind farm development would be in least conflict with landscape and other natural heritage interests – in part responsibility devolved to local authorities via NPPG6 and PAN45 for local implementation of

National policy – Moray has given clear guidance to industry by producing wind energy policy guidance document – Drummuir proposal recognised all these strategy contexts.

- Although it does not cover targets for capacity and timescale the wind energy policy guidance consulted upon and published by Moray Council forms a very important element of the development plan and it is in this context that Drummuir has been developed and should be assessed.

Environmental Assessment

- Erroneous to state that RES has falsely claimed to have consulted Moray Raptor Society – RES claim to have consulted Moray Raptor Study Group – RES Ornithological Consultant, upon the advice of RSPB, contacted specific member of that group for information.
- Bird surveys carried out during breeding season which is a particularly sensitive time for various species – no guarantee that every species that uses site at other times of year will be present at survey time – discussion with local bird enthusiasts and RSPB has allowed for identification of key interests that might occur at other times of year.
- Scoping study for environmental assessment did not identify impact on migratory birds as being a potentially significant impact and therefore was not addressed in the assessment. This is not to say that the issue was not considered at scoping stage.
- RES noise predictions are not purely hypothetical – based upon noise characteristics of a sample candidate wind turbine measured according to established procedures in combination with a complex and calibrated noise propagation model.
- Measurements set in context of actual background noise measurements for Drummuir site itself – noise predictions are therefore best estimate of what the noise impact of the wind farm would be.
- Report referred to in objection describes how noise can propagate from wind turbine under special circumstances – location of the study was German/Dutch border – wind turbine noise limits in these countries far less stringent than UK.
- Noise procedure adopted in UK must be viewed in a probabilistic, statistical context and there is no guarantee that noise limits will never be exceeded – in fact in all likelihood they will – given that only on rare occasions could conditions approaching those described in the report be expected it can be concluded that they would not affect in a statistically meaningful way overall compliance of the scheme would target noise limits.

Inadequate/Misleading consultation and publicity

- To knowledge of RES no one left exhibitions having been given a false impression of visual effect – allegations are unfortunate and are not at all reflective of the courtesy of which most residents of the area have greeted RES.
- RES has concerns about submission made by Community Council regarding initial application – position of community council does not seem to be reflective of local public opinion.
- RES has requested opportunity to address Community Council on a number of occasions but without reply – met with Community Council briefly in May 2002 at an early stage to confirm the project was in its early stages and seek guidance

on how to ensure appropriate community dialogue – the stakeholder committee being the outcome. RES concerned that Mr Graham of SWIM given opportunity without RES right to reply to address what RES believes was a public meeting organised in Mulben and which was used to give local community councillors a mandate to take a particular stance at full meeting of community council.

- RES knows from representations on original application that Mr Graham had worrying accusations to make about proposal. As a result of successful challenge that RES made against these claims via the advertising standards authority the accusations could not be substantiated – reasonable assumption that this information was aired at Mulben meeting and in no small part gave rise to consultation response from Community Council.

Adverse Visual Impact

- Scottish Executive advice makes it clear that wind farms will become a common rural site and must be excepted as such.
- Visual amenity should not be confused with visibility – RES has addressed amenity through adopting a 1 km separation zone from nearest neighbouring houses – note the addresses of those objecting on visual grounds are by no means the nearest neighbours.
- Planning system must weigh the impacts of the scheme – in visual context meaning the scale of effect, its duration and number of people affect – against benefits of the scheme – emissions savings, whether these are of a long lasting nature and number of people that stand to benefit.
- Formal inclusion of Knockmore transmission mast was not included in scoping for the environmental statement – could be argued that the proximity of the mast to the wind farm provides an important existing vertical element that assists the baseline landscape to accommodate the wind farm.
- Experience suggests that fears about visual impact subside rapidly once a wind farm is operational.
- Landscape and visual affects are highly subjective but findings of professional landscape and visual consultants report included within the environmental statement and subsequent amendment in response to consultation from SNH is pointed to.
- Cumulative affect has been assessed and included within the ES – amount of wind energy that is ultimately developed in Moray in Scotland will be limited by the need for diversity of supply, by grid capacity and by cumulative visual and other affects – RES questions whether these limits are as yet being exceeded by wind farms currently in an advanced stage in Moray.
- RES local opinion polls showed the majority of people in vicinity of Drummur are happy with concept of Moray being at least 100% self sufficient in electricity from wind.
- Important to look at wider context of wind farm and to realise that proposal is direct consequence of Government action designed to alleviate or arrest affects of global warming and climate change – if not tackled these affects would have very significant impacts on attractiveness of living in Moray.
- Comments on the redesign do not give justice to fundamentally different design approach that has been taken to turbine layout and track routing.

- Appropriateness of 25 km cut off point for cumulative visual impact assessment challenged – RES suggest that at 25 km, even if visible, wind farm would not be a significant visual feature and limit is more than adequate.
- True that figures now cut off at 25 km but radius for actual assessment is unchanged.
- ZVI diagrams are poor tools for assessing visual impact whether in isolation or cumulative – can only reasonably be done by more sophisticated imagery.
- List of public domain wind farm proposals given with inference that they should all have been included in the cumulative assessment – due to differences in timescale this is not practicable and is an issue discussed extensively with SNH, Moray Council and Scottish Executive.
- Not view of Scottish Executive that wind farms should be put in remote locations – planning advice states that general public must become used to sight of wind turbines – important balance to be struck in siting wind farms which avoid being unreasonably close to people but at the same time avoid undue encroachment into wild land – RES view is that Drummuir represents a very good compromise.
- Claim that Scottish Executive has already breached PAN45 has no relevance to current application – details of Clashindarroch ZVI are included as appendix to amendment of application.

Impact on Flora and Fauna

- Blanket statement that belies extent of work gone into ecological and ornithological assessment of site – design process has ensured that ecological interests have been fully protected.
- Consultation response from SNH regarding initial application resulted in considerable new work being undertaken to ensure amended design would have no significant impact on peat land – all areas of deeper peat have been avoided and nowhere does the track traverse peat which is deeper than 0.6 m.

Roads

- Necessary upgrading works to access connecting with A95 have been identified and are of a minor nature. Upon completion of wind farm RES would ensure that road is brought back to at least pre construction condition standard.
- A95 as a major route should theoretically maintained to the level fit to withstand passage of heavy construction traffic – RES cannot be held responsible for condition or deterioration of this road.

Impact on Private Water Supplies

- No justification for this on equivocal statement – ES has addressed hydrological issues and no reason to suppose, with appropriate care and design, construction and operation that there will be any hydrological impacts of any significance.

Impact on Property Values

- Not a relevant planning issue.
- Best statistical rather than anecdotal information available suggests that in vicinity of a prospective wind farm a negative impact on saleability can occur during the uncertain stage prior to consent/construction but once built there is full recovery.

Adverse Impact on Tourism

- Neither factual basis nor evidence from elsewhere to substantiate this.
- Taken collectively it can be concluded from Visit Scotland survey and from a similar MORI poll in Argyle that public appreciates value of wind energy both sufficiently sophisticated to realise that siting wind farms in most valued scenic areas would be inappropriate.
- Setting of Drummuir is highly influenced by human intervention (forests, roads, industry etc.) and RES contend that a wind farm proposal would be consistent with the visual expectations of visitors.
- Considerable spin put on findings of both Visit Scotland and MORI visitor opinion surveys – RES working hard to ensure that its schemes bring appreciable local, regional and Scottish economic and other benefits.

Impact on Television Reception

- RES happy to reiterate guarantee that all problems will be solved – this undertaking is included in the ES – RES expects planning conditions to cover this responsibility.
- Some localised degradation of reception is expected in areas where a weak signal is already experienced – remediation would be straight forward.

No Local Benefit

- Via local wind farm stakeholder committee RES has discussed a range of local benefits and a range of initiatives along the way – briefly these are:
- Network of link paths to integrate wind farm tracks with existing recreational path networks.
- Creation of a wind farm community fund – at an earlier wind farm RES established a fund at the rate of £700 per megawatt but have also stated that the market norm is currently £1,000 per megawatt – if community wish to share risk then payment could be enhanced by linking it to annual production rather than fixed capacity – over the full life of the wind farm this might yield in the region of £1.5 million for the local community.
- Creation of community business to work the community fund revenues in order to increase their value.
- Request to local electricity network operator to route the grid connection via the line of the Keith-Dufftown railway in order to ensure that weighleaving payments could be directed into developing this tourist facility.
- Collation of commercial data from prospective wind turbine suppliers in the UK and Scottish content of turbines that they would supply if awarded the contract.
- Use of local firms/labour for civil construction and from payments of business rates and recycling of rental payments host estate into fabric of that estate.
- RES has been offered a network connection on the distribution side of the bulk supply point at Keith rather than into the regional transmission line at Drummuir which means there is an even higher probability of the output being consumed locally than was argued before.

Appendix 6E

Summary of letters in support of proposal

Letters in support of the proposal have been received from;

- Alex Gordon, Drummuir Estate, Drummuir, Keith, Banffshire, AB55 5JE
- Rod Lovie, 35 Main Street, Newmill, Keith, Banffshire, AB55 6UR
- Donald Cameron, 38 Hamilton Drive, Elgin, Moray, IV30 4NL

The main points made are as follows;

Reduction of Emissions

- Anything which reduces amount of toxic emissions which pollute atmosphere is sensible
- Although Scotland already exports electricity and we do not need to generate more anything which replaces coal generated or nuclear electricity is preferable even if it is not used in Moray
- Renewable energy sources such as wind the only way forward instead of fossil fuels

Site has no real value

- Site for wind farm is currently barren moorland with very little to recommend it in way of wildlife, agriculture or sporting

Provision of additional amenity

- Tracks proposed for servicing turbines would provide further amenity for walkers

Visual impact acceptable

- Area is moderately scenic but without any formal designation and has passed environmental impacts
- Matter of opinion is to whether turbines spoil landscape
- Already tolerate miles of pylons and other structures which are usually not noticed
- A wind farm would be seen from some miles but at a distance where turbines would not appear conspicuously

Environmental impact acceptable

- Familiar with Novar Wind Farm – no environmental damage there
- Wind farms operate in other countries particularly Denmark with no adverse effect on wildlife, environment, tourism

Will not harm tourism

- Area has modest tourist industry – doubtful if wind farm will deter visitors to distilleries, salmon fishing or other sporting venues
- Moray poll reveals tourists would actually be attracted to wind farms as a Visitor Centre

Contribution to energy generation

- Wind farm has wide local support and enables Moray to support national targets in guidelines and production of renewable energy

Devaluation of property not proven

- Devaluation of property is still unproven although it might come to be true

Publicity of proposal and public meetings

- Representatives of local organisations such as Drummuir and Mulben Community Associations and Strathisla Community Council have had the chance to air their views at Stakeholders Meetings
- Drummuir Estate or RES are under no obligation to hold Stakeholder Meetings or exhibitions at all – the first time that Stakeholder Meetings have been held for Wind Farms in the whole of the UK
- Newsletters have been distributed to thousand of households and RES representatives have visited the 100 nearest houses to inform residents and listen to concerns

Local Benefits

- Rent income to Drummuir Estate would be almost entirely spent on local tradesmen and new buildings thus recycling it into local economy RES have promised to make donations for advantage of local organisations

Complies with policies

- Proposal does not depart from Local and Structure Plans
- Policy S/ED1 is not contravened as it will be inappropriate to house a wind farm in a town or established business area
- Proposal in accordance with Moray Council document Wind Energy Policy Guidance L/ED10, L/ED15 and S/ED7
- Proposal seeks to minimise the impact of local environment and will enhance Moray's environmental assets and so does not contravene S/ENV1 and L/ENV2

- Design of Wind Farm has attempted to minimise the visual impact and therefore does not contravene S/IMP1, L/IMP2 or L/IMP3

Information from objectors

- Support project and exception taken to manner in which canvassed by objectors
- How many thousand campaign documents have been distributed and how many objections have been intimated – certain to be a small percentage of total population