



Scottish Council for National Parks

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Ross Finnie MSP
Minister for Environment and Rural Development
Pentland House
47 Robb's Loan
Edinburgh
EH14 1TY

28 February 2006

Dear Mr Finnie

CLYDE MUIRSHIEL REGIONAL PARK AND WINDFARMS.

Our attention has been drawn to the very large number of wind farms which are under discussion on sites within the Clyde Muirshiel Regional Park.

The SCNP's primary aim is to promote the protection, enhancement and enjoyment of nationally outstanding areas that are National Parks, or are appropriate to be designated as such, or are of sufficient merit to warrant special protection. This is manifest in our support for good stewardship of the country's best environmental assets and encouragement of sustainable methods of development. Clyde Muirshiel Regional Park is shown in your recent consultation paper *'Enhancing our care of Scotland's Landscapes'* as an *Area of Great Landscape Value*. Accordingly, we wish to express our concern that the wind farm developers are pursuing sites within a Regional Park which also contains a proposed Special Protection Area, a situation which we believe has been brought about by an absence of clear locational guidance from the Scottish Executive.

You will be aware that within the planning system in Scotland, the development plan, comprising the structure and local plans for an area, has primacy and there has to be some overriding reason in order to allow a departure which is contrary to policy. The first renewable energy policy approved in a structure plan in Scotland was prepared by the Strathclyde Regional Council in 1995 and subsequently approved by government. This document indicated areas which, subject to local planning, might be suitable for wind farm development. Regional Parks were specifically excluded because they represent areas with fine landscapes, valuable ecosystems and provided for much needed space for informal outdoor recreation close to urban populations and much enjoyed by people from Glasgow and other central belt towns.

The structure plans which followed on from the Strathclyde Plan, namely those for Glasgow and the Clyde Valley and for Ayrshire, have also made it clear that Clyde Muirshiel Regional Park would not be a suitable location for wind farms. Both plans indicate areas which would be appropriate search areas for future wind farms. The local plans for Inverclyde, Renfrewshire and North Ayrshire are in conformity with their respective structure plans and also make it clear that wind farms



in the Regional Park would not conform with the plans. Development Plan policy has been consistent and clear for more than a decade and the equivocation has come at the national level.

Because of the lack of clarity at a national level, wind farm developers now have schemes at varying stages of preparation which, if approved, would result in approximately 300 turbines within the park boundary. A list of the schemes together with their sizes is appended.

The impact on the Regional Park would be devastating. Viewed from the south side of the Garnock Valley there would be a turbine panorama from the existing wind farm at Ardrossan and that under construction at Dalry, through 180 degrees all the way to the east of Lochwinnoch. This wild and beautiful area would be destroyed both as an *Area of Great Landscape Value* and a place within which to enjoy informal recreation. Tourism plays a very important role in this area and provides far more jobs than any wind farm development. These jobs would be seriously at risk.

In the past, we had similar problems with afforestation where, for tax reasons, it was very advantageous to put money into tree-planting. At the time there was no locational guidance, and a great deal of harm was done to places such as the Flow Country, the Highlands and areas in Argyll and Bute which were the breeding and feeding grounds for eagles and other threatened wildlife. These were all areas of international significance in tourism terms. With the production of *Indicative Forestry Strategies* across Scotland, it was possible to channel the resources of the forestry industry into areas where their activities, subject to good planting schemes, could be welcomed. In general terms, the preparation of *Indicative Forestry Strategies* was welcomed by the industry because they could avoid wasting valuable time and money pursuing sites which were unlikely to gain support.

Something similar now needs to be done with wind farms - indeed it is clearly long overdue. If as a society seeking to use scarce and valuable resources wisely, we allow waste of energy, time and resources pursuing the development of wind farms on some of Scotland's most sensitive and valued landscapes, future generations will not easily forgive us. Such issues should not be left entirely to market forces but the industry's skill and energy should be guided by those who have the responsibility to take an integrated approach which balances the need for renewable energy generation with the need to sustain an environment for which Scotland is internationally renowned.

In the recent White Paper 'Modernising the Planning System' it stated, *"The Scottish Executive is committed to reviewing planning policy on renewable energy developments. The review will consider how best the Executive's renewable energy targets can continue to be delivered. The review will also consider the need for a spatial framework for wind energy and will be informed by the work of the Environmental Advisory Forum for Renewable Energy. The National Planning Framework will reflect any revised planning policy on renewable energy."*

We urge you and your fellow Ministers to take steps as a matter of



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urgency to bring this review forward so that the energies of the renewable energy development industry can be channelled constructively for everyone's benefit. We look forward to hearing from you.

Yours sincerely

Chairman.

Cc:

Malcolm Chisholm MSP, Minister for Communities

Patricia Ferguson MSP, Minister for Tourism, Culture and Sport

Nicol Stephen MSP, Deputy First Minister and Minister for Enterprise and Lifelong Learning

Allan Wilson MSP for North Ayrshire and Deputy Minister for Enterprise and Lifelong Learning