

## **Response to**

### **Orkney transmission project: Consultation on Final Needs Case and Delivery Model,**

My perspective and input on this is as a member of the public and a professional with experience of Environmental Impact Assessment and the Planning process. I am a retired Member of the Chartered Institute for Ecology and Environmental Management. I was active as a representative of objectors to the recent (2018) Planning Permission applications for two wind farms in Orkney, which were refused by the Orkney Islands Council Planning Committee.

I confine my submission to the questions asked in section 2: the Final Needs case Assessment, specifically issues raised in question 6 regarding OFGEM'S minimum-generation threshold of 135MW or SHE-T's 'Alternative Approach' threshold of 70MW, by end of 2019.

Clearly, the possibility of significant generation from tidal exists only on the long term and can be discounted from the current consideration. The case rests on wind. The consultation document alludes in section 2.16 (summarised in section 2.23) to the uncertainties about future wind generation too. A major one is the prospect of obtaining planning consent, especially in the light of the two recent refusals. It appears that SHE-T have chosen to disregard this in their appraisal. These two wind farm applications were refused by OIC Planning Committee because they were against policies and guidance, primarily on landscape and visual impact, expressed in the Orkney Local Development Plan. The developers argued (I summarise in my own words) that Scottish Government policy on renewables, and the economic and social benefits for the local economy were of over-riding importance, whilst adverse impacts had been significantly and sufficiently minimised. In the Planning Committee's minds, the quality of the environment and its importance for the quality of life in these islands was in fact the over-riding factor.

In this context, the prospects of reaching the 135 MW or 70 MW thresholds are dependent on very few but large generation projects going forward, one of which is being developed by Orkney Islands Council. Yet the size of this proposed project, and its site on the southern hills of Hoy, on the edge of a National Scenic Area and dominating the southern approach to Orkney from the sea would cause far greater adverse landscape and visual impacts than the two wind farms just refused by its own Planning Committee. Adverse ecological impacts are likely to be potentially much greater also, due mainly to the close proximity of a Special Protection Area and associated vulnerable bird species. Recently, Sea Eagles have returned to breed on the island of Hoy and have become a major tourist attraction; there must be some level of risk to these too. There is no evidence of widespread support for such a scheme. Even before a decision is reached it will face opposition and numerous regulatory hurdles over a long period. In short, there is not a remote possibility of this development being approved by the end of 2019, and it is quite likely not to be approved at all. Without it, there can be no 70MW.

Looking further ahead, to the prospects for land-based wind generation development in Orkney, there is a sense that the refusal by OIC Planning Committee of these two recent applications marked the moment when groups of very large turbines were seen as unacceptable in the Orkney landscape. The future, and sustainable development, in Orkney will belong to other forms of renewables as soon as they mature.

■

8 February 2019