

## **The Reality of ‘Community Consultation’ on the Talladh a Bheithe Scheme**

‘Keep Rannoch Wild’ is concerned that Talladh a Bheithe Windfarm Ltd is making unjustified claims in respect of the level and nature of community consultation on its windfarm proposal. In particular, its *‘Pre-Application Consultation Report’*, lodged as part of its application, states: *“During the pre-application consultation process, the Applicant’s emerging proposals for the proposed development ... received a broad range of comment and feedback from the local community, which has influenced the surveys undertaken and the development of the design which is submitted seeking consent. Levels of local support were apparent throughout the consultation and leading up to the submission of the application.”*

We would like to present the facts to rebut the applicant’s implications of (firstly) adequate consultation (secondly) of any significant levels of local support and (thirdly) of any substantive involvement by the community in the development of this scheme.

### **Government ‘Good Practice Guidance’ of January 2013**

The Scottish Government supports an expansion of renewable energy *‘in appropriate locations’* and advises applicants that the *‘Key Points for a Successful Application’* are that *“early and effective engagement with affected communities and key consultees is of vital importance, beginning in the pre-scoping phase and continuing throughout. This will increase the chances of suitable developments being consented quickly and reduce the chances of refusal or planning delays caused by conflict, deficiencies or gaps in the environmental information provided ... Commitment to initiating and maintaining a clear, transparent and credible dialogue process with all parties concerned is the best way to earn trust. (page 4) ... We strongly advise applicants to engage meaningfully with key consultees and communities at (pre-scoping) stage and in particular prior to developing a scoping report.” (page 10)*

### **Actual Levels, Timing and Quality of Consultation**

- The applicant submitted the ‘Scoping Report’ for this scheme in November 2011. We are not aware of any consultation whatever with the Rannoch community on the scheme *‘prior to developing a scoping report’*, as recommended in the Government Good Practice Guidance, nor indeed of any consultation for two years afterwards;
- The applicant’s own documentation claims that the scheme has been under development since 2007 but that public consultation on it formally commenced in November 2013 – with a newsletter and exhibition – which is incompatible with the applicant’s claim that *“feedback from the local community ... has influenced ... the development of the design which is submitted seeking consent”*. The scheme has actually been six years in the making without benefit of any community consultation;
- Without consulting - or at any stage even *informing* – the Rannoch community, the applicant attempted to have the intended site excluded from the mapping of ‘Wild Land’ in this area by a ‘case study’ submission in November 2013 to the national consultation on SNH policy. If it had been successful, this submission would have severely weakened the planning protection of the site. The key point made here is that at no time has the Rannoch community ever been informed or consulted by the applicant on this key initiative to pre-empt the planning considerations for this scheme;
- The applicant created a Community Liaison Group (CLG) of its own nominees, chaired and minuted by its own agent. This met on six occasions in 2014, from February to July

and was always civil though sometimes critical of the scheme. Minutes have been issued for four of those meetings. The applicant's chairperson advised CLG members on 23 July 2014 that the applicant will be *'considering how best to revise and restructure the composition of the group to ensure that such discussions can be progressed in a constructive manner, and directed towards those with a direct interest in progressing the matter.'*

- Since July there has been no communication from the developers to the Community Liaison Group, the Future Development Group, the Community Council nor so far as we know with any other group that might be considered to represent the Community.

### **Actual Levels of Support and Opposition to the Scheme**

There is good evidence to query the implications in Eventus's (carefully-worded) claim in its application that *'levels of local support (for the scheme) were apparent'*:

- a brief poll by the community council, restricted to locally-registered electors and seeking a simple indication for, neutral or against, concluded that 38 respondents were broadly in favour of the scheme, 12 were neutral and 155 were opposed to it. If accurate, it showed that only 18.5% of those who would directly gain from the much-publicised community inducement of £375,000 per annum actually supported the scheme that might deliver it;
- The number of locals who have approached 'Keep Rannoch Wild' to express support and ask to receive our regular e-mailed updates is currently 176, which is surprisingly high given the small resident population around Loch Rannoch and usual reluctance to engage;
- Not one local organisation or estate (other than the applicant's) has expressed support for this scheme. Nine neighbouring estates have formally objected and others who have not formally objected have approached Keep Rannoch Wild to offer support if this application is pursued through to Public Local Inquiry stage;
- Of the 1,000+ formal representations to Ministers on this scheme, only 3% of those catalogued at this point are supportive and nearly 97% are opposed. Many of those substantive objections are from Rannoch residents.

### **Summary based on Fact**

'Keep Rannoch Wild' concludes, on the basis of firm evidence and direct involvement, that:

- Amongst local electors there is a clear majority (at least 75%) who oppose this scheme, even though these are the people who could expect to gain from 'community benefit' inducements. *'Levels of local support'* are indeed *'apparent'* – and remarkably low;
- Widening the definition of 'local community' to include the substantial number of second-home owners and regular visitors to Rannoch would simply increase further the percentage of that wider community who are opposed to this scheme;
- Amongst all those – whether locals or visitors from elsewhere - who took the trouble to write a formal submission to Ministers on this scheme, around 97% objected to it. This number and unanimity of opposition to a windfarm proposal is unprecedented;
- 'Community consultation' on this scheme has come much later in the process than advised by Scottish Government's 'Good Practice Guidance', has completely failed to sway local opinion in favour of it and has deliberately excluded some essential issues. 'Community consultation' has led to no substantive alteration whatever to the proposed scheme.

On the evidence, the many and repeated claims by the applicant of 'extensive' community consultation and (even) support cannot be justified. 'Consultation' in Rannoch has only

occurred over the final eight months leading up to submission of this application and appears to be driven simply by a need to demonstrate a token compliance with Ministerial guidance.