

Executive Director
Shetland Islands Council
Infrastructure Services Department
Planning Department
Grantfield
Lerwick
ZE1 0NT

25 December 2009

Dear Sir

With reference to the following planning applications:

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| 2009/350/PCD | Erection of temporary 60m data mast Flamister, Nesting. |
| 2009/355/PCD | Erection of temporary 70m data mast Mid Kames. |
| 2009/356/PCD | Erection of temporary 60m data mast Scar Quilse. |
| 2009/357/PCD | Erection of temporary 70m data mast Scalla Field. |
| 2009/358/PCD | Erection of temporary 70m data mast Runn Hill. |

I am submitting this representation as chairman and on behalf of Sustainable Shetland, a democratically constituted group with a current membership, almost entirely local residents, of over 660 individuals.

Sustainable Shetland wishes to lodge objections to these applications on the following grounds.

The data from these masts is directly linked to the application by Viking Energy Partnership for a 150 turbine wind farm in the central and north mainland of Shetland. Three masts have already been in place for three+ years and a planning application for the wind farm has been submitted on the strength of this data, we contend that this should be sufficient for the current stage of the project. Given that Sustainable Shetland, Scottish Natural Heritage, Scottish Environmental Protection Agency, Royal Society for the Protection of Birds, Shetland Amenity Trust, John Muir Trust, Shetland Bird Club, Shetland Angler's Association and many others have objected to the project on environmental grounds and on concerns relating to the carbon payback of the project; we feel these issues should be addressed before any further investigative work which would incur damage to the hills is carried out. Furthermore we question what useful additional data can be gained, particularly from the Scalla Field mast given its close proximity to the previously located mast on Gruti Field.

The current planning applications appear to have anomalies with regard to the securing methods illustrated. We note the masts are proposed to sit on a timber board and the anchoring method refers to a buried anchor plate. The first three masts at Laxo Knowe, Gruti Field and South Mid Field sat on a small concrete base with concrete blocks securing

the guy wires; surely this would be a minimum requirement in Shetland with its 'world class' wind! We would point out that the Gruti Field mast, although higher at 100m, blew down in a severe, but not exceptional, gale in October 2008; I have enclosed photographs to illustrate this. The current five applications are therefore either incorrect or we believe inadequate.

With regard to the Gruti Field mast this blew down as mentioned on the Saturday afternoon of 25 October 2008. Something Viking Energy Partnership were aware of but failed to inform the public until it was reported to the media and they were subsequently questioned on 28/29 October the following week. On 4 November I personally visited the site and the windward guy wires were in a state of abnormal tension with the concrete anchors dragged through the peat moor, yet no attempts had been made by Viking Energy Partnership to inform the public to this effect, or cordon off the area. My visit coincided with the arrival of contractors who subsequently released the guy wires and made the site safe. However the site had been in a dangerous state for a period of nine days. This in our view does not display a responsible or compliant attitude by Viking Energy Partnership and does not indicate good Health and Safety working practice.

Further to this, permission on all three masts then in place had expired on 1 March 2008 according to the planning consent. To the best of our knowledge and in conversation recently with the planning department this was not renewed. That being the case the failure of the Gruti Field mast occurred with no planning consent in place. Further, the Laxo Knowe mast was only taken down towards the end of the summer 2009, presumably after 31 August if planning consent conditions were adhered to. The remains of the Gruti Field mast we believe were removed at the same time, however contrary to the planning condition that everything should be removed and the habitat reinstated, the concrete anchor blocks were not removed, we assume this would also be the case with Laxo Knowe. The South Mid Field mast is still in place apparently with no planning consent.

Finally we note in the case of the first mast applications access was indicated by ticking 'use an existing access', there is no existing access to any of these sites! With the current applications this has been addressed by a covering letter but there is no indication of what the access route would be. Also regardless of whether anchor plates or concrete foundations are used there will be a requirement for excavation, this has never been mentioned!

Given that both Viking Energy Partnership and the council planning department have displayed this lax approach with adherence to conditions and indeed to basic Health and Safety practices we would urge that the decision on the current planning applications should not be delegated to planning officials. We feel there is a requirement for the council planning board to discuss the current applications given the apparent transgressions with regard to the initial installed masts. We reiterate that planning permission for these masts should be refused until the objections to the wind farm as they stand are addressed.

Yours faithfully

Billy Fox
Chairman
Sustainable Shetland