

Subject: Proposed Wind-Turbine Development  
**NV-08965-20 Reväsvaara**

Dear Registrar,

My wife and I run a tourism business in Övertorneå attracting guests from Sweden, throughout Europe and as far away as Australia and New Zealand. Sorry my Swedish is very poor, so I will attach a Swedish translation of this text below, but the translation tool, may make errors.

We are a unique venue specialising in making it possible for travellers with disabilities to experience the nature, beauty and culture of the Tornedalen Valley and are totally opposed to the Reväsvaara Windfarm development.

If the Reväsvaara project is allowed to go ahead, then it is highly possible that more windfarms will be built on the Finnish side of the river.

Because of this real threat of further developments, I believe the opposition now should be based not only in stopping this project, but also to set a precedent to prevent any future proposals if so close to the river, thus protecting and preserving the beautiful landscape, character and nature of the Tornedalen valley for the foreseeable future.

I understand from speaking to local people here that it is perhaps not in Swedish people's characteristics to actively object and oppose, and that there is more of a "we don't like it, but we don't think we can stop it" mindset, but please believe me that everyone I have spoken to in the area is opposed to these wind-turbines being built in the proposed location and I can guarantee that our overseas guests would not like to see the landscape affected by windfarms.

I also understand there are cross-border sensitivities and relations to be considered, but as it seems so little consideration has been given to the impact on the Swedish side of the river, I don't think Sweden should hold back in objecting as strongly as possible.

I attended the recent public meeting in Hedenäset and, having seen the presentations on that evening and having also read the impact assessments and planning documents published by the developers, I am amazed at how they have simply dismissed all of the objections raised as if they mean nothing. It seems, to me, to show a complete lack of respect and understanding of the serious impacts of this project on the environment, the nature, businesses and valley communities in Sweden.

This project seems to have been kept very quiet with minimal public consultation and advertising for such a large project, and the argument personally expressed to me on the night of the public meeting by a member of the presentation team was basically "well everyone on the Finnish side is happy, so there are winners and losers".

I can only imagine how busy you and your team must be at Naturvardsverket, but I beg you to please do all you possibly can to prevent this development from going ahead and having such a damaging impact, on such a very special environment and in so many ways.

So, I will move on to the concerns I have, and trust you will be able to please use all the powers of Naturvardsverket to make sure these concerns are all independently researched, ideally by the relevant EU bodies, and not just allowed to be dismissed by the developers and they go ahead and build anyway.

I am very sorry I am going on here and you probably have all these matters in hand and have an extremely strong case prepared, but with so much at stake, we have to do everything we possibly can to protect and preserve the nature and special character of the Tornedalen Valley landscape, before it is too late. Thank you so much.

Lastly, the views expressed here are my personal views, and any facts, figures and details given are, to the best of my knowledge, accurate and true.

Kind regards,  
Paul Roberts

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**1. Impact on the Landscape:** With these turbines being 230m tall (equivalent to a 70 storey tower block and almost 100m higher than the highest building in Finland) and then being placed on the high points of the prominent ridges so close to the river, the visual impact of these turbines will be seen for many, many miles.

Yes, of course there are building and roads in the area, but the scale of these turbines is so far beyond anything in existence in rural Övertorneå, and they will definitely be damaging to the views, beauty and character of the landscape over a vast area, and not just Hedenäset, as the developers claim in their responses to this concern.

The Tornedalen Valley attracts visitors from all over Sweden and also many more from all over the world, and one of the most magical experiences for them is to experience the views across the almost endless pristine forest scenery. Wind-turbines of this size will create a huge scar on this natural scenery.

There will also be a much greater impact on those living in communities close to the turbines, especially those who enjoy looking out across the river.

## 2. EU-Natura 2000, Birds and Protected Habitat:

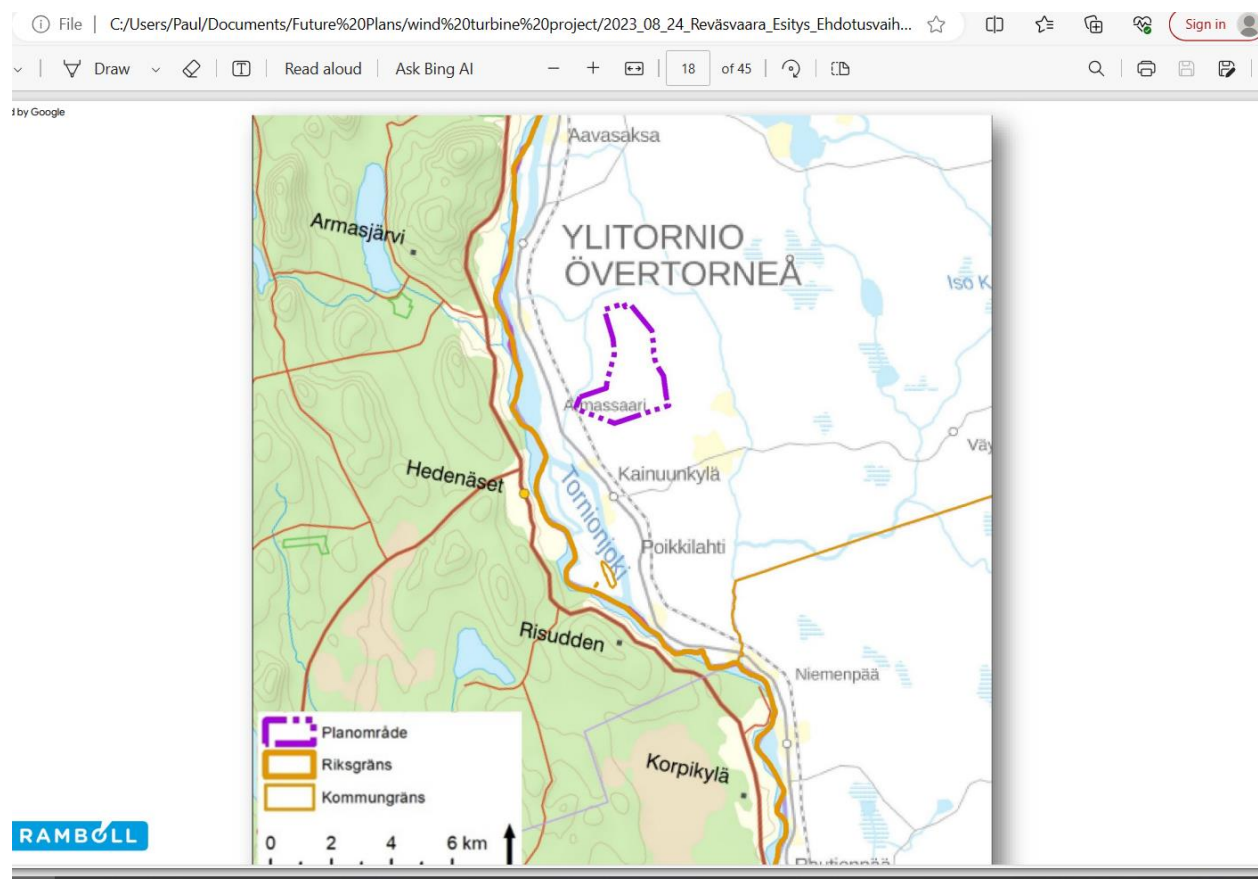
Information taken from Website (link below) Natura 2000

Stretching over 18% of the EU's land area and more than 8% of its marine territory, Natura 2000 is the largest coordinated network of protected areas in the world. It offers a haven to Europe's most valuable and threatened species and habitats.

In practice- Natura 2000 is a network of core breeding and resting sites for rare and threatened species, and some rare natural habitat types which are protected in their own right. It stretches across all 27 EU countries, both on land and at sea. The aim of the network is to ensure the long-term survival of Europe's most valuable and threatened species and habitats, listed under both the Birds Directive and the Habitats Directive. More details from this link below.

[https://ec.europa.eu/environment/nature/natura2000/index\\_en.htm](https://ec.europa.eu/environment/nature/natura2000/index_en.htm)

The image below shows the location of the windfarm (taken from the planning proposal)



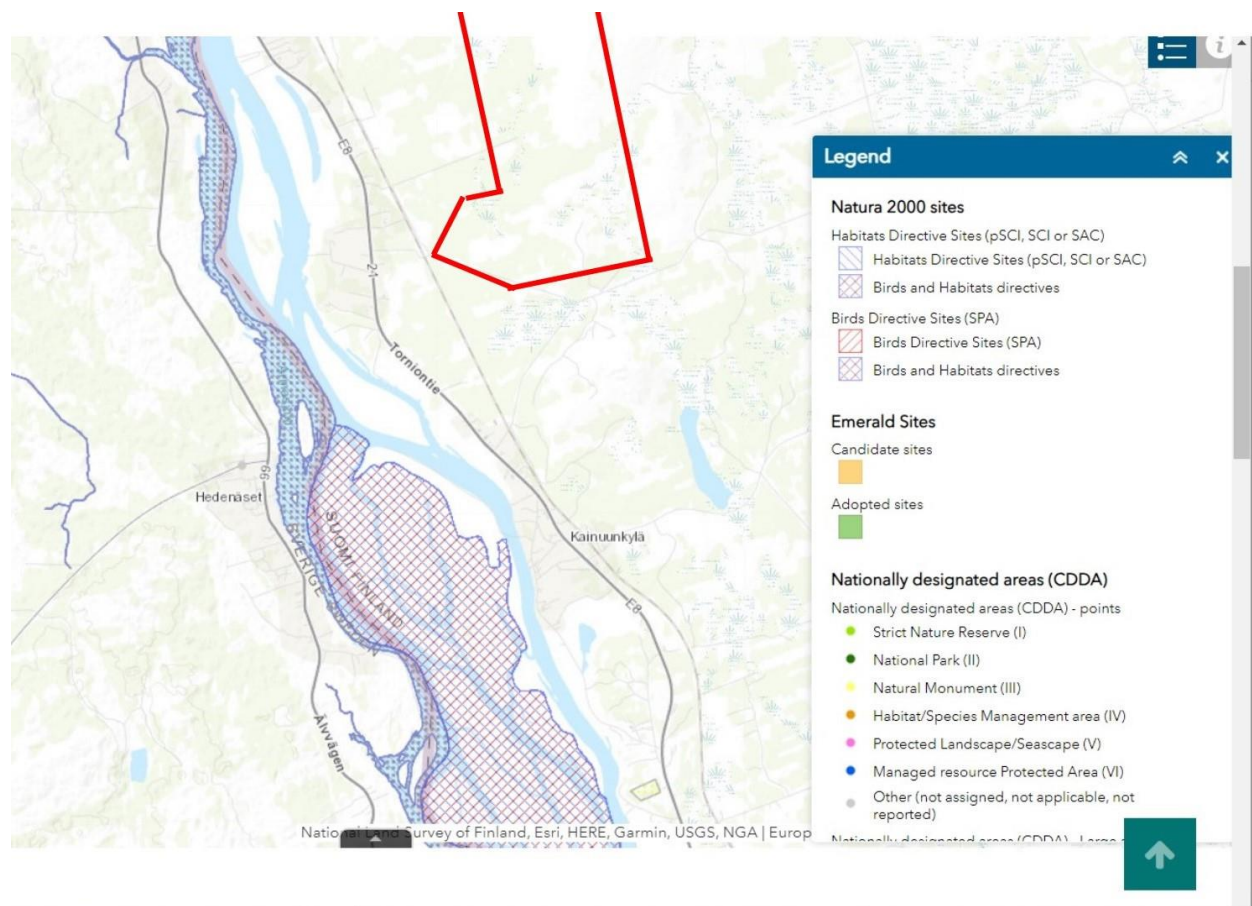
The next image below, shows the location of the various Natura 2000 European protection areas along the Tornedalen Valley, and in the vicinity of the windfarm site, taken from the EU Birds and Habitats Directive. Link to interactive map is below.

The protected areas span both Finnish and Swedish territory and need to be protected.

The blue box shows the approximate location of the windfarm development.

<https://www.eea.europa.eu/data-and-maps/explore-interactive-maps/european-protected-areas-1>

You can see that the 2 locations are extremely close and full investigation and consultation needs to take place between the planners and the EU Natura 2000 Officials. Natura 2000 will need to be advised.



**Birds and Protected Habitat:** These areas are protected for a reason and a huge numbers of birds travel up and down the river and its' borders, especially during their annual migrations, including Sea Eagles, Cranes, Whooper swans, Ducks, Geese, Other Water Fowl, Swallows, Swifts, Great Tits, Blue Tits, Gold Finches, Pipers and so many others, but I am not a bird expert so cannot give you a full list. We also have visits by Eurasian Curlews which I believe are on the EU list of protected species.

**3. Tourism:** The developer's statements dismissing previous concerns of the possible impacts on tourism show a complete, or deliberate, lack of understanding for what tourists love about Lapland. The open spaces, the endless forest views, the big skies, the connection to nature, the peace and solitude, escaping industry and enjoying the activities that take people into these places (e.g. husky rides, cross country skiing, snowmobiling, snowshoeing, walking, hiking etc.) are among the biggest drivers for tourism.

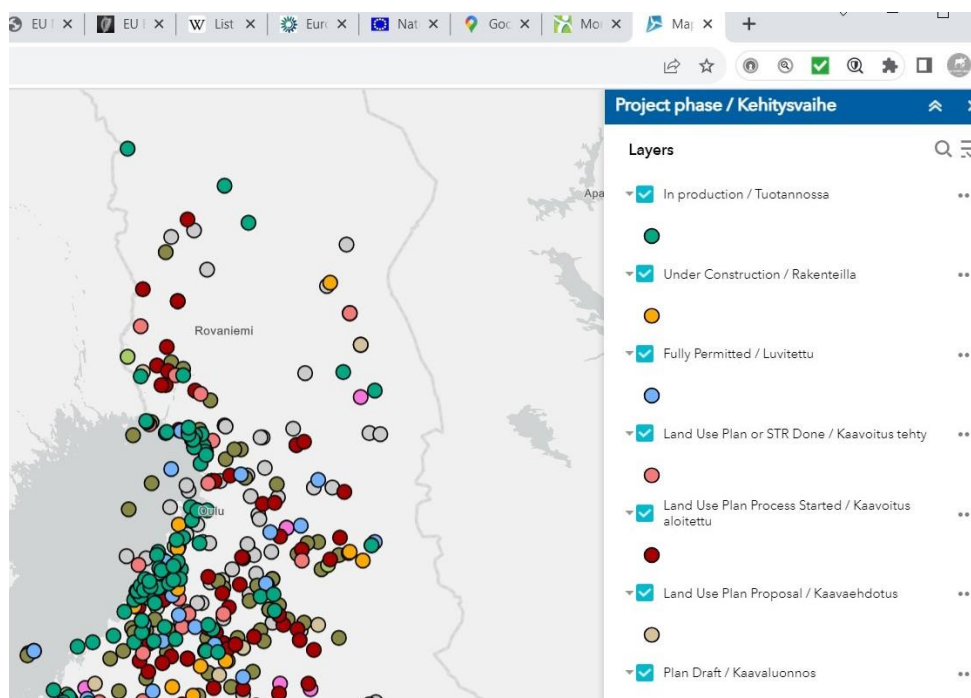
The other huge driver for tourism is the dark skies that make for good sightings of the Northern lights, especially when watching from a raised vantage point to have that huge sky view e.g. Luppioberget. The flashing warning lights at such a height will certainly be a negative impact when it comes to viewing in the direction of the windfarm.

Whilst this windfarm development in itself, might not impact over too huge an area, the fact that planning permission for this one may lead to more windfarms, poses an even great threat to tourism.

There IS evidence available confirming that windfarms can have a negative impact on tourism, and that is despite the fact that so few, if any, will have been allowed to be built in such beautiful, natural, inhabited environments as the Tornedalen Valley.

I am sure any developers wishing to build wind-turbines on the hills surrounding Rovaniemi would soon be made aware of the negative impact on tourism. I know other factors come into play, but it seems more than a coincidence that the hugely popular tourist area of Rovaniemi is devoid of wind-turbine developments as the map below clearly shows.

Source: <https://tuulivoimayhdistys.fi/en/wind-power-in-finland/map>



**4. UNESCO World Heritage Site - Struve's Geodetic Arc:** I note in the report that this has been given plenty of attention, but do the developers have official written confirmation that they have been in communication with UNESCO about the possible impact of the wind turbines on this world heritage site and that the development has been approved by UNESCO?

**5. Neighbourly Relations:** One of the amazing and special things we have discovered since living in Övertorneå is the closeness and friendliness between the two neighbouring communities and countries. For one partner to make a decision to develop a project that impacts negatively so much more on their neighbours, than on their own residents, does not seem to be a fair and decent way to be acting.

Everyone on the Finnish side will still have their beautiful unspoilt views across the river, and Ylitornio kommun will receive the financial benefits, but the same cannot be said for Swedish residents.

I believe the agreement and principle between the two countries that prevents the river being dammed for Hydro-electric should also apply to a block on this and any future wind turbine developments so close to the valley, on either side.

**6. Alternative Sites:** I completely understand the need for clean energy and that wind-turbines are a good way to generate this, but I feel the biggest problem here is not the actual wind-turbines, but the fact that the proposed location is so sensitive and damaging.

If an alternative site can be found that is further inland from the river valley, then the impact upon the landscape, valley communities, bird life and habitat, tourism, character of the valley etc. will be greatly reduced and I, and many others I am sure, would then support this new development.

Mr P. Roberts  
Owner-The Friendly Moose  
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