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STROUPSTER PLI PRECOGNITION OF STUART YOUNG VISUAL IMPACT

Mr Shiel

I believe that the visual impact of the Stroupster Windfarm would be such that it merits refusal on stand-alone grounds as well as cumulative.

Borrowpit

The FEI document “Construction Material Requirements, Borrowpit Development Design And Environmental Review” says that:

“The temporarily stored peat and drift shall be spread over the restoration blasted rock faces and over the borrowpit floor area to a thickness comparable to that as the existing situation. Once enough working room is established within the borrowpit floor area, these restoration measures can be carried out progressively where possible when the site is still operational. Peat and drift material shall be placed upon the shallower restored rock faces to encourage vegetation regeneration in order to soften the landcover transition with that of the surrounding land. Overall, the former rock faces shall be restored to a mixture of shallow rock faces, scree slopes, and intermittent peat cover which shall revegetate over time.”

The designed rock slopes are 10-15° at the lower levels, and 35° degrees at the upper levels. Given that “the presence of slope gradients greater than 4° (approximately)...is one of the factors which are likely to influence the potential for peat instability”, then we know that peat will not stay on rock slopes of 10° or more. At best, and only after a long time, some vegetation will regenerate in cracks and ledges, but the escarpment will forever be a bare rock face.

Travellers from John o’Groats will be presented with an escarpment around 10 metres high and 200 metres long which then changes direction and tapers to nothing over a distance of 300 metres or so.

The footprint of the borrowpit is in the order of 4 hectares in area, about the size of 6 football fields, and will be there forever. Every south-bound traveller on the A99 will see it, as will every east bound traveller on the road from Canisbay.

The statement in the FEI that

“Overall, few viewers will be affected by the borrowpit development, therefore throughout its life the borrowpit shall have a slight visual impact, which will reduce to negligible to slight upon restoration”

cannot be justified.

I submit that if planning permission had been sought for the borrowpit in isolation as a quarry, its visual impact would have merited its refusal.

Turbines

In 2005 SNH wrote:

Whilst we agree with the impact assessment for designated landscapes, in our opinion, should this proposal proceed, it would be highly visible from large areas of the wider Caithness landscape.”

In 2007 SNH wrote:

IMPACTS OF STROUPSTER ALONE

The turbines would be visually prominent but would not be a dominant feature nor prevalent within views into, out of and within north east Caithness. For these reasons the landscape and visual impacts of Stroupster alone are acceptable.

Refer to Appellant's document App 02, Figs 5.3 and 5.4.

Fig 5.3 is the ZVI showing predicted tip visibility. Note the extent to which all 12 tips are visible. Fig 5.4 is the ZVI showing predicted hub height visibility. Note the relatively small reduction from the predicted tip visibility. Note also that turbine A is set some 30 metres lower than turbine I so when the tip of turbine A comes into view there will already be sight of the higher located turbines. Similarly when the hub of turbine A comes into view, there will already be sight of a major part of the higher located towers.

There are a number of man-made vertical features in Caithness which provide useful references when considering the degree of visibility of Stroupster windfarm. These are:

- The former water tower at Nybster
- The communication mast at Brabster
- The communication masts on Orlig Hill
- The very tall, but very slender, mast at Thrumster

Keeping a lookout for these features whilst travelling around Caithness gives one an appreciation of the extensive views available across Caithness, and the surprising distances and locations these features are visible from.

The tower at Nybster above Auckengill is almost 8 metres wide at its base and just over 20 metres high. It sits on the high ground which leads on to Stroupster Hill at an elevation just under 70 metres. It is prominent in views from many parts of Caithness, some of them

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unexpected, and it is true that if one can see the tower, one would see the turbines. It is also true that the turbines will be visible from many more places than the tower will.

- A Stroupster turbine would be three and a half times the Tower height to the hub, and a further twice more to the tip.
- The hill on which the water tower sits is not as high above sea level as the height to turbine hub.
- The 12 industrial units will occupy an area on a hilltop 1 kilometre wide at its narrowest and just over 2 kilometres at its widest.
- The visibility of the turbines is not only widespread, it is widespread with a high degree of visibility of turbine parts.
- The highest turbine tip would reach to 600 feet above sea level overlooking the most populated part of Caithness outside Thurso and Wick, most of which is on land below 100 feet.
- The development is prominent from the north/south and east/west tourist routes.
- The development cannot be seen against a backdrop from any location, it will always be skylined from wherever it is viewed.
- Even SNH considers it visually prominent over a wide area.

The turbines would be visually prominent but would not be a dominant feature..

I ask myself “What further attribute or property would this development have to exhibit for SNH to promote it from prominent to dominant?”, and I cannot answer that. It seems to me to already have all the features of “dominant”.

I can, perhaps, shed some light over SNH reaching the conclusion it has.

Please refer to CWIF-W Documents CW17 and CW18.

CW18 refers to an application for 2 turbines at Lieurary in Caithness. Please look at the 2 visualisations and note the poor photographic quality, poor turbine representation and an almost total lack of information.

Please turn to the fourth page of the SNH report which follows. SNH delivers its visual assessment of the development in two and a half lines.

The next document is a e:mail from Mr Gordon Mooney to me enclosing a copy of a letter he sent to the developer. Please turn to the second page and read from "Visual Impact Assessment" to the top of the table on the following page.

Mr Mooney found all these issues wanting and insisted that proper material had to be provided before an assessment could be made of the application.

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The next document is a e:mail to me from Ms Lesley Cranna, SNH Area Manager, in response to an attempt to sell my services to SNH. The URL actually refers to Visualisation Representation of Windfarms-Good Practice Guidance. (The Guidance)#

Ms Cranna confirms that "we look to developers to produce visualisations of an appropriate standard , and now, if they do not follow the advice given at (the Guidance) we would object and require further information to be produced."

SNH did not follow its own advice, but instead came to a conclusion based upon totally inadequate visual effects.

Looking now at CWIF-W document CW17.

This refers to a 2-turbine development at Bettyhill in Sutherland.

The first document is the Planning Report from Highland Council's Landscape Architect. The larger part of this report is given over to the shortcomings of the Developer's Landscape and Visual Analysis and its concluding paragraphs state this ***"On the Cumulative Impacts the lack of detail in the presented analysis makes it difficult to either support or oppose the ES conclusions. An ES should be sufficiently complete that its content can be reviewed with confidence, not so scant that further assessment is required.***

On balance, it is likely that a small development at a reasonable distance from other similar development will not have significant cumulative impacts, but I have serious concerns that we do not have sufficient information presented to be fully confident in this."

Yet SNH did not even comment on the quality of material, let alone reject it, and still came to a conclusion on visual impact, which the HC Landscape Architect was reluctant to do based on the information at her disposal.

To compound matters, please refer to the final point under **1.2 SNH recommends that:**
"A new viewpoint be established for visitors, to replace the one beside the A836 at approximately NC 749 6219."

The next page in the series is a photograph looking west from the viewpoint referred to. This view is arguably the finest on the north coast. It is hugely popular with tourists and locals alike. It has a very substantial layby and it needs to. To be fair to SNH, it did raise an objection on 2 out of 4 visual issues, but had it asked for a competent Submission it might have raised more.

The final document is a repeat of Ms Cranna's e:mail to me as referred to above.

Once again SNH did not ask for its standards to be applied nor reject substandard material. For SNH to suggest moving the viewpoint so that tourists would not see the view and turbines together is ludicrous, and demonstrates how far removed SNH has become from the image of "Guardian of Our Landscapes" that most people still erroneously hold.

Other examples of SNH accepting images with viewing distances less than the Guidance of which I am personally aware include the Beaully-Denny Transmission upgrade, The Muaitheabhal Windfarm on Lewis, and the Causeymire Windfarm in Caithness.

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The Guidance says of Correct Viewing Distance (VD) that images should be between 300mm and 500mm for hand-held viewing, strongly recommends 400-500mm, and describes 300mm as the “minimum acceptable”

“Minimum acceptable” is, nevertheless, acceptable but it comes with an unwritten subtext “**provided everything else is ok**”. A poor quality photographic image combined with an “acceptable” 300mm viewing distance is not acceptable.

Please refer to Appellant's document App 02.

In Spring 2005, when Highland Council still would not allow as much as a hen-house to breach the skyline, I was trying to work out how to predict the visibility of wind turbines in the landscape. I attended a public meeting held by npower renewables in Auckengill Hall showing plans for the Stroupster Windfarm. I studied the visualisations in this document and came to the conclusion that this was a well-sited and fairly unobtrusive development.

By the Autumn of 2005, I had become much more knowledgeable about proposed windfarm development in general and windfarm visualisations in particular.

In the Autumn of 2005, I responded to the consultation headed up by SNH on “Good Practice Guidance for the Visual Analysis of Windfarms” which ultimately led to the current accepted Guidance, “Visual Representation of Windfarms-Good Practice Guidance”.

My theme was that the visualisations should inform, and I used images from Stroupster Appellant's Document App 02 to illustrate examples of the bad practice found in many windfarm ES visualisations.

I will explain with a few examples from App 02.

1. Poor representation of the appearance of turbines.

Refer to VP 01 Brabster, VP 03 Warth Hill, VP 05 Auckengill.

Refer also to the series of photographs of Buolfriuch Windfarm in CWIF-W Document CW15. My camera was set by accident at a resolution of 2 Megapixels (normally 8) yet the small turbines at Buolfriuch are perfectly discernable at 18 kilometres.

2. Use of wireframe images where a photomontage would be more informative.

There are only 5 photomontages in the ES and only 1, Warth Hill can be said to be taken at an important location. The man in the street does not relate to wireframe images. Locations which merited a photomontage, in my view, would include VP 04 Freswick, VP 08 Noss Head, VP 09 A99 North of Reiss, VP 13 Watten, VP 15 Lyth, VP 16 Bower, and VP 23 Dunnet Head.

3. Poor quality photography.

Most of the ES images are poor. The more important the viewpoint, the poorer the image. These are some examples of poor photographic quality disguising the nature of the outlook.

- VP 07 Bridge of Wester. Contrast this with CWIF-W Document CW6-300 (same scale as the ES) from the same location. Look for the tower at Nybster and for the village of Keiss.

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- VP 08 Noss Head. Contrast this with CWIF-W Document CW5 taken from near Noss Head at the path to Castle Sinclair Girnigoe. There are 2 castles (Keiss old and new), a prominent water tower, and extensive settlement in this view.
- VP 09 A99 North of Reiss. The farm buildings are only 650 metres distant from the Viewpoint. Refer also to Highland Council Document HC 14 Viewpoint 9a.
- VP 11 Thrumster. This photograph has no definition. Even the nearby sheep are indistinct. Contrast this with CWIF-W Document Thrumster taken from some 300metres nearer Thrumster. Note the prominent silos right of centre. Note also that there is a near horizon on which these silos stand, and that the turbines are located on a more distant horizon. The horizon in ES VP 11 is the near horizon. The windfarm site is not even in this picture, nor is Warth Hill and nor is the far horizon reflected in the wireframe.
- This viewpoint location is extremely important. The first real sight of Stroupster Windfarm to a northbound traveller is from the northern end of Thrumster from where CWIF-W's image was shot. It is a wide landscape with few distinctive features.

SNH said *“The turbines would be visually prominent but would not be a dominant feature nor prevalent within views into, out of and within north east Caithness.”*

I beg to differ.

- Viewpoint 23 Dunnet Head. Contrast this with Highland Council's Document HC 14 Viewpoint 23.

4. Images which do not inform the nature of the location.

Viewpoints 04 Freswick, 05 Auckengill, 06 Nybster, and 07 Bridge of Wester could be fields anywhere. Viewpoints 18 Slickly and 12 Tarroul Moss might on first viewing appear to belong in the same category but, in fact, they are true representations of the nature of the location.

CWIF-W Documents CW1 and CW2 are presented to show the nature of the settlements of Freswick, Auckengill, and Nybster, and their relationship with the windfarm, which cannot be deduced from the ES images. I could have provided similar demonstrations from the communities of Lyth, Killimster, Bower, Watten, Barrock, East Mey and others. I will address Bridge of Wester below.

5. Images which conceal the nature of the view or location.

Viewpoint 22 Barrock is one such case. The photographic quality is poor, but it is representative of the landscape. It is just possible to discern that the horizon the turbines appear over is a foreground low hill which slopes away to the left. If the photographer had gone 50 metres left, or 50 metres back up the road he came, then it would be clear that Stroupster Windfarm is highly visible from Barrock. See CWIF-W Document CW23 shot from a house some 250 metres to the east.

Viewpoint 07 Bridge of Wester is another case. In the village of Keiss there will be some visibility of turbines, but only as glimpses behind houses or trees etc so there is no

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representative location in the village. The ES presents Bridge of Wester as an alternative viewpoint:

“5.208 This viewpoint is located on the A99, to the south of Keiss and southeast of the proposed Stroupster wind farm, and is representative of views obtained by local residents and road users.”

Bridge of Wester is some 2.7 km from the centre of Keiss. See CWIF-W Document CW3 which is Keiss village viewed from the A99 some 1.5 km from the centre of Keiss, and which I submit is more closely representative of the views from Keiss, is a more rational location than Wester Bridge, and it (or a nearby location, there are plenty of choices) should have been presented instead in the ES.

In 2005 when I attended the Stroupster Windfarm exhibition in Auckengill Hall, I was uninformed and naïve in respect of windfarm visualisation. Given the nature of the visual effects in this Environmental Statement, it is understandable that I came away believing “that this was a well-sited and fairly unobtrusive development.”

Given that SNH does not question the quality or accuracy of Visual Information or Assessment presented to it, it is not surprising that it concluded that:

“The turbines would be visually prominent but would not be a dominant feature nor prevalent within views into, out of and within north east Caithness.”

A statement which is demonstrably erroneous.

CWIF-W wishes to recommend 3 specific locations which the Reporter should visit to test SNH’s assertion:

- The first is Thrumster.
- The second is Noss Head, although the CW5 location gives a virtually identical view, is easier to get to, and provides an opportunity to see Castle Sinclair Girnigoe close up.
- The third is Warth Hill which I will describe in detail.

A photograph cannot show what is seen by the human eye, and it is difficult to get a truly representative photograph from Warth hill because of the distances involved and the subtle shades in the landscape. The ES image from Warth Hill is not a bad one, but it does not do the view justice. It requires exceptional conditions to get a really good photograph from this location, and I have tried and failed on many occasions, but even in relatively poor conditions the actual view is stunning.

From this point,(See CW34 Caithness and North Sutherland map) the lighthouse at Noss Head can be seen at a distance of 9 miles, Scaraben 33 miles, Morven 34 miles, Ben Alisky 28 miles, the Griams 38 and 40 miles, Ben Klibreck 55 miles, Ben Hope 57 miles, Ben Loyal 51 miles, and on exceptionally good days, Ben Spionnaidh and Cranstackie on the shores of Loch Eriboll, some 64 miles away.

The ES says:

“The Stroupster wind farm would be prominent in views to the southwest and the large scale of the turbines would reduce the prominence of the distant mountains on the skyline.”

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I would suggest that the view would not be seen again during the lifetime of the development as the turbines will dominate the view, not the mountains, and this is too precious a jewel to squander.

CWIF-W undertook to indicate locations from where the Reporter may view existing wind turbines in similar conditions to those shown in ES images, so that he can make an informed assessment of their visual impact independent of photomontage and wireframe image etc. technology.

As the Stroupster turbines are skylined from all viewpoints, Causeymire windfarm does not give comparable views but Buolfruich windfarm does. From Spittal 18km away, Buolfruich turbines are visible for almost all of the journey across the Causewaymire and there are opportunities to stop and consider them at various distances. However, the Buolfruich turbines are small, only 68 metres to the tip, and spaced much more closely together so they do not give a good direct comparison.

They are, however, a good reference for comparison, and CWIF-W Document CW15 uses ES wireframe images at roughly similar distances as the viewpoints indicated on the Causewaymire. By using the wireframe images viewed at 500mm with Buolfruich Windfarm as a real reference, the difference in scale and impact between the real windfarm and the Stroupster proposals can be easily and accurately assessed, much more so than normal when the proposed development has to be assessed against a piece of paper.

Cumulative impact.

A visitor from the south will already have experienced windfarms before he gets to Caithness. He will encounter the Buolfruich windfarm as he enters Dunbeath. He will emerge from Thrumster and find Camster Windfarm on his left, and Achairn and Bylbster appearing from behind Blingery Hill. On the other side of Wick as he approaches Tesco, Camster Windfarm will dominate the horizon to the south-west with all 25 turbines visible from hub height, and Achairn and Bylbster dominate the view west. If he buys petrol at Tesco he will also get a view of Causeymire Windfarm beyond Bylbster.

Mr Shiel, would you not think that at that point he might well consider that he was already in a landscape dominated by turbines?

I believe that Caithness will rue the day Camster Windfarm was approved, and that we will find out when it is built that Camster was the windfarm too far.

Please consider this:

When Stroupster is built and our visitor emerges from Thrumster, windfarms would dominate 90° of the horizon.

As he leaves Wick on his way north he might mutter dejectedly, to paraphrase the Charge of the Light Brigade, "Turbines to the right of me, Turbines to the left. Into another lot ahead of me." deeply regretting coming to Caithness for his holidays.

Mr Sheil, Caithness already has an unfair burden placed upon it.

Caithness Windfarm Information Forum and Wayfarer urge you to refuse this appeal.