

Planning Application : The Burn Of Whilk, East Clyth (Yarrows)

Proposal Description The application by Npower Renewables is for the construction of a wind farm comprising 13 turbines, maximum capacity of 3MW, 116 metres high (350 ft) to blade tip and 70 metres to hub, with a 90m rotor diameter, and including 8km of access tracks and improvement to existing access tracks, formation of site access onto the A99(T), erection of switch room building and compound including septic tank and soakaway, erection of a permanent 70 metre anemometer mast, construction of 2 bridges, installation of underground cabling, formation of two on-site quarries or borrow pits and erection of temporary construction compound and welfare facilities. The route of the grid connection is undecided.

Planning Application Reference 06/00676/ FULCA

Deadline for Objections **28th June 2007**

Use the following form to submit an objection by post.

Objection Form

Name (Required)	<input type="text"/>
Address (Required)	<input type="text"/>
	<input type="text"/>
Town (Required)	<input type="text"/>
Postcode (Required)	<input type="text"/>
E-Mail	<input type="text"/>

Planning Application Consent to construct and operate a wind farm at
The Burn of Whilk, East Clyth (Yarrows)
Planning Application Ref: 06/00676/ FULCA

Please enter your concerns and reasons for objecting in your own words in the text box below. This will ensure that your objection is recognised and counted as an individual objection.

Reasons for Objecting

Please select as many of the items listed below which you consider are also relevant to your objection.

Highland Renewable Energy Strategy

- ❑ The application is contrary to the Highland Renewable Energy Strategy (HRES), which defines the area as having a presumption against development of major and national scale windfarms. Highland Council have already judged the site on its merits and found it unsuitable. If planning consent is given to this application the whole process of public consultation and development of a strategy will have been worthless.

Landscape & Visual Amenity

- ❑ The proposed development is sited partly on moorland and partly within an existing coniferous plantation which will be felled during construction. There is a strong visual relationship between the site and the coast and sea nearby. The A99(T) tourist road between Wick and Latheron is on the coastal strip, where there are nearby residential settlements and individual properties, some far too close to this site. An industrial wind farm within this large scale, open and windswept landscape, would be extremely obtrusive and out of character.
- ❑ The updated version of the Environmental Statement states "To the north, visibility in all directions is maximised". No photomontage of this view is contained in the documentation.
- ❑ The impact of this development on the landscape character would be severe. The turbines would be visible from a wide area including the nearby Yarrows Archaeological Trail, East Clyth, Ulbster, Roster, Sarclet and Thrumster. The development would also be visible as far away as Wick, Stroupster, Keiss, Ackergill, East Mey, Bilbster, Causeymire and Spittal. It is near to the Hill of Olicett which is part of the Caithness and Sutherland Peatlands Special Protection Area and Ramsar site (also known as the 'Flow Country'). A wind farm should not be allowed in such a sensitive area. It is against planning policies G2, G3, T5 and T6 and is against policies E1 and E2 of the Highland Structure Plan.

Archaeology

- ❑ The Burn of Whilk site forms part of a significant cultural landscape and turbines would impinge markedly on it. The Environmental Impact Assessment (EIA) acknowledges that there are 123 sites and monuments in the surrounding area. Apart from ruined croft houses there are a number of prehistoric sites within the wind farm moorland area including the Cairns of Warehouse, a standing stone, remains of a hut circle, chambered cairns, a broch and a fort. There is a mound and a hut circle within the plantation.
- ❑ The exploration of the Cultural Value of the landscape is defective – the authors of the assessment state "the cultural values of archaeological and historic sites and monuments are not directly vulnerable to visual impacts. Their cultural value lies in their "ability to inform" which remains unimpaired by visual impacts." The phrase is an invented one which has nothing to do with any recognised criteria for assessing cultural value. Burn of Whilk and its surrounding area is highly significant and valuable to local people and visitors alike whether they are informed or just charmed by the landscape. The relationship between people and place is important in this instance and has not been explored.
- ❑ 13 turbines cannot be mitigated in this setting; there is a significant threat to archaeological sites and monuments being disturbed or destroyed during the construction period.

- It is against Policy BC1, which seeks to preserve archaeological sites. It is totally unacceptable to build a wind farm in such an archaeologically sensitive area with monuments dating from the Mesolithic Period to the ruined crofts of the Post Clearance eras.
- The developers cast the landscape of Yarrows/Burn of Whilk as the "...continuing type, and the emplacement of a wind farm in this landscape is consistent with the dominant cultural trajectory – wind farms can be viewed as only the most recent in a succession of land uses deemed by contemporaneous societies to be appropriate in marginal areas"

Yarrows/Burn of Whilk is a classic example of a relict landscape that has barely changed since the Bronze Age. It is demonstrably NOT of the continuing type, and a wind farm would not constitute any type of consistent progression. It would be a monstrous intrusion into one of the finest untouched ritual landscapes in Northern Europe.

Tourism

- The site is near to, and includes a part of, the Yarrows Archaeological Trail, a major and world renowned tourist attraction. The amenity of tourists and locals alike visiting the trail will be destroyed by the presence of an industrial development such as this nearby.

The updated cultural assessment offers no study into the effect this will have on visitors, except to say that many people like windfarms. There is no attempt to see what the effect would be on this particular landscape which is visited as much for its beauty and charm as for the richness of its archaeology.

- It would be visible from the following historic and prehistoric sites: Hill of Many Stanes (Historic Scotland Site 2 km to the south), the Cairn of Get (Historic Scotland Site 1 km to the west), the Cairns of Warehouse, the Grey Cairns of Camster (also a Historic Scotland Site 3 km to the north west), Old Man of Wick which is a ruined castle and also a Historic Scotland site 9 km to the north east.
- It will also be visible from Wick Distillery, the former Caithness Glass factory, Wick Golf Course, the Picnic Area at Watten, and Castle Girnigoe and Sinclair (13 km away), all tourist attractions.

Geology, Hydrology & Peat

- The site is on bedrock of the Wick Flagstone Group overlain by blanket bog, wet and dry heath and isolated patches of glacial till. It varies in depth from 0 – to 3.5 metres, the average being 1.23 metres. The site slopes especially within the forest area. When trees are felled this can put any slopes in excess of 7%, on any depth of peat over 0.5 metres, at risk of peat slide during the construction period. Turbines 4, 8 and 12 appear to be on slopes exceeding 7%.
- Borrow Pits (new local quarries) can add to the scarring. Excavating for turbine foundations dries out the peat, as does the formation of tracks and any ditching, The damage to the peat will be permanent, it cannot be restored. It would be destructive to this landscape.

- ❑ There is no information in the Environmental Impact Assessment (EIA) on peat stability. There is no peat stability survey and slide mitigation statement. This is totally unacceptable as it is necessary to establish peat depths, slopes, sub-peat water in the blanket bogs, water flow and drainage.
- ❑ The hydrology of the whole area will be affected. Loch Brickigoe, a Site of Special Scientific Interest (SSSI) lies to the north. The site has three watercourses – the Burn of Whilk, a small tributary and the Burn of Clyth – which eventually drain into the sea. There is a risk of erosion and sediment deposit, caused by ground disturbance, so there is a risk of polluting these watercourses, which will also affect the flora.
- ❑ Peat absorbs CO2 greatly in excess of rain forests. If the purpose of constructing a wind farm is to save our CO2 emissions, then it defeats the purpose to build any on peat, especially where deep.

Ecology

- ❑ Loch Watanan, the Hill of Warehouse, Thrumster Mill Loch and the Hill of Olicett are all Sites of Special Scientific Interest (SSSI). The East Caithness Cliffs is a Special Protection Area (SPA) and the Hill of Olicett is also a component part of the Caithness and Sutherland Peatlands SPA and Ramsar site. These special areas are close to the proposed development.
- ❑ There will be habitat disturbance to otter, water vole and pine marten. Otter is an internationally important species of mammal with the European sub-species being listed as globally threatened. Pine marten is a nationally important species which has disappeared from most of England and all of Wales, Northern Scotland holding a strong population. Felling of the forestry will remove the main habitat of the pine marten. Water vole is a nationally important species which is in severe decline. There have not been any studies done to assess the impact on bats.
- ❑ The site is in the vicinity of the Caithness and Sutherland Peatlands Special Area of Conservation (SAC). Its aquatic vegetation, such as Shoreweed Littorella, Uniflora, Bulbous rush and Bog pondweed, thrives in blanket bog, and in world terms blanket bog is rare and of international importance. The Caithness & Sutherland Peatlands SAC and Special Protection Area (SPA) comprise the most intact area of blanket bog in the world. It should not be disturbed.

Birds

- ❑ Bird survey work undertaken for this development is considered to be grossly inadequate, with the exception of the Hen Harrier survey in 2006. The upland breeding bird survey did not follow standard methodology and winter survey work was not undertaken to assess the impact on migratory geese and swans. Further bird surveys should be undertaken and the application resubmitted.
- ❑ The development lies close to component parts of the Caithness and Sutherland Peatlands Special Protection Area (SPA) and Ramsar site. The SPA supports nationally important populations of eight species of birds listed in Annex 1 of the European Birds Directive, namely Red Throated Diver, Black Throated Diver, Hen Harrier, Golden Eagle, Merlin, Golden Plover, Wood Sandpiper and Short Eared Owl and an internationally important population of Dunlin.

- ❑ 19 species of birds of conservation concern were identified during survey work. A pair of merlins habitually breed close to Warehouse Loch. Woodcock emerge, often in large numbers, from the forestry on their way to feed on the East Clyth crofts in winter.
- ❑ Of particular concern is the impact this development would have on breeding Hen Harriers. Hen Harriers are listed on Annex 1 of the European Birds Directive and are therefore, protected from all risks. There are thought to be only 500 breeding pairs in the UK, the Caithness and Sutherland Peatlands SPA supporting 2.8% of the British population. Hen Harriers were identified nesting close to the proposed site.

Noise

- ❑ For the residents in the surrounding area, the noise implications for them will be significantly detrimental, and contrary to Policy G2 in the Highland Structure Plan. Bruan Lodge (a private house in Mid Clyth), would be severely affected particularly during the construction period, as it would be beside the construction access track off the A99(T). The effect of the noise has been minimised by basing its assessment on simple noise levels rather than assessing the complex noise pattern emitted by low frequency, low-level aerodynamic and mechanical sound from the gear box, turbine and blades. This can be very distressing to those living nearby along the A99(T) road and minor roads off it. Infrasound can be detected at distances of up to 10 km from a wind turbine.

Shadow Flicker

- ❑ No assessment has been carried out for shadow flicker. This can be very distressing and may well affect the Yarrows Archaeological Trail and nearby properties. A full shadow flicker assessment should have been undertaken by the developers.

Socio-Economic Issues

- ❑ Tourism would be badly affected by this industrial development in a wide open rural environment. It will be conspicuous from the A99 Wick to Latheron trunk road and it would impact badly on the archaeology of the area, directly affecting the Yarrows Archaeological Trail.
- ❑ The nearby, popular falconry business would collapse as falconers will not let their birds fly anywhere near wind turbines.
- ❑ Anglers who come in considerable numbers to enjoy fishing in the quiet setting of Yarrows and Loch Brickigoe will also be deterred from visiting the area resulting in loss of local income.
- ❑ Forty new jobs which the developers state will be created will only last during the construction phase. Once operational it will only require two people to maintain the windfarm. One falconry job would be lost.
- ❑ The development would be contrary to Policy G1 of the Highland Structure Plan as it will not help the social and environmental wellbeing of the people of Clyth and beyond.

Please acknowledge receipt of this objection in writing

Please complete the form and send it by letter post to **Director of Planning and Development, Highland Council, Glenurquhart Road, Inverness IV3 5NX**

Thank you for taking the time to register your concerns about the proposed windfarm.