

Planning Application : Mains of Durran, Castletown

Proposal Description This application by SSE Generation Ltd is for 13 turbines - 90 metres to the tip (295 ft), with 70.5 metres diameter rotors.

Access to the site will be from Wick Port west along the A882 through Watten, right towards Gillock along single track road past Bower Quarry, left on the B874, right onto unclassified road past Tister, then left to Durran.

Planning Application Reference 08/00386/FULCA

Deadline for Objections **26 March 2010**

Use the following form to submit an objection on-line

Objection form

Name (Required in capitals)

Address (Required)

Town (Required)

Postcode (Required)

Planning Application To construct and operate a wind farm at Mains of Durran, Castletown.

Planning Application ref: 08/00386/FULCA

Note: Whilst it is acknowledged that there have been amendments to the original application these are, in fact, on a micro level. In other words they are too small to be worthy of individual comment. The reasons for objecting listed in this form are current and reflect the fact that our view of the installation has not changed. Three additional issues have been added as a result of scrutiny of the revised documentation.

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

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

Revised Application Issues (first three below)

Community Consultation

- This statement regarding consultation is misleading. Local community councils and the vast majority of individual residents have not had any contact with the developers. The community has not been consulted appropriately on this development. The contact with Bower Community Council referred to is very much out of date. The developers have not been in contact with the Chair of Bower Community Council and any statement contradicting that is not true.

Avian Survey Data

- The Avian survey appears incomplete. During that time the landscape altered significantly as a substantial amount of commercial forestry ground was cleared of timber, therefore opening new flight paths and feeding areas. The accuracy of the data and assumptions made from that are therefore questionable. Durrans Mains in combination with other applications in the planning system will have an adverse impact on the integrity of the Caithness Lochs Special Protection Area (SPA).
Current population of Greylag geese and Whooper Swans in Caithness Lochs SPA is below the baseline levels held by RSPB/SNH therefore this proposal if approved would further reduce the population of these important species.
Surveying work done by the applicants would appear to be incomplete.

Archaeology- 5.3. Cultural Heritage

- The claim that the wind farm does not lie within 1 km of an Ancient Monument or listed building is incorrect - the nearest turbines to the Long Cairn (an Ancient Monument) are respectively 300 metres and 400 metres away with the remainder following closely on.

The developer claims that the impacts of the turbines on this and other cairns 'have been assessed as being of minor or lesser significance.'

This is in direct disagreement with the attitude and approach taken by Highland Council's Archaeology Section in respect of the Planning Permission granted for a single storey replacement house adjacent to the Long Cairn. This permission was only very reluctantly granted after measures were taken to satisfy Planning Department's deep concerns about the visual impact looking at the new house from the Long Cairn.

However, looking at the new house from the Long Cairn would now include the huge turbines mentioned above, only 300 metres and 400 metres away, backed by all the other turbines, all at a height of 90 metres to tip, a height which would dwarf the new house. If Highland Council is not disturbed by this prospect then it would make a mockery of their own assessment of this site on previous occasions.

Socio-Economic Issues

- There are numerous houses located well within 2km of the proposed development. This development would have a significant long-term detrimental impact on the amenity of people living nearby.

- National Planning and Policy Guideline 6 (NPPG6) says this in relation to people:
“Locational Considerations
22. The aim of the Scottish Executive therefore is to ensure that the commitment to renewable energy is satisfied and supported through development plan policies and development control decisions unless, at the site level, there are serious adverse impacts that can not be mitigated. These could include the following.
 - In relation to the local community, developments should not be permitted where they would have a significant long term detrimental impact on the amenity of people living nearby, and **where the impact cannot be mitigated satisfactorily.**”

- Scottish Planning Policy 6 (SPP6) says this: (Annex A)
“Communities
Broad criteria should be used to set out the considerations that developers should address in relation to local communities. These should ensure that proposals are not permitted **if they would have a significant long term detrimental impact on the amenity of people living nearby.**”

Location

- The proposed location is contrary to the Highland Renewable Energy Strategy as it is in an area with a presumption against large scale windfarm development.
- The proposed location is in the middle of the settlement of Bower (with a population in excess of 500) and within 1km or less to the communities of Stemster, Durran and Hilliclay. This development is contrary to the Scottish Executive’s planning policy SPP6 which recommends turbines should not be situated within 2km from communities.
- The proposed location is far too close to occupied housing, as close as 340m to a house site which has full planning permission.
- The cumulative impact of this proposed development - with others already operational, approved, and in planning across this part of Caithness - is completely unacceptable.

Transport and Access

- Construction of the wind farm will require major plant and equipment to be delivered to the site. This will involve many abnormal loads being transported over unsuitably narrow roads and will require the uprooting of miles of ancient hedgerows. This rural road system is already in a very fragile condition and could be severely damaged.
- The proposed site is surrounded by businesses which rely on the road network to be open at all times (farmers, haulage, contractors, local residents etc).

Landscape and Visual Amenity

- This will be more than significant – it will be extreme. The cumulative effect with the existing wind farms, as well as those proposed in Caithness will be extreme. The overall visual impact will mean very few residents in the county would be free of viewing turbines. Views from nearby tourist viewpoints will be devastated.

- The open character of the sloping landscape is mixed agriculture and settlement. The elevated nature of this landscape is such that a wind farm with such tall turbines in this location will be visible over much of Caithness from all directions. The effect of these turbines will not be moderate. Their effect on the landscape will be significant.

Archaeology

- There are a number of prehistoric cairns in the immediate vicinity, the nearest being the Long Cairn. This is only 300 metres from the nearest turbine, with the whole range of turbines being overwhelmingly visible and detrimental to this cairn and many others.
- The local cairns appear to be part of an archaeological landscape, a feature that Historic Scotland would not wish to see suffer detrimental impact.
- There is an ongoing planning application in this area for a very small scale replacement single storey house and Historic Scotland have insisted on re-siting to a lower level to prevent any detriment. These proposed wind turbines will make any small impact arising from the house pale into insignificance.

Tourism

- The proposed development would also have a long term detrimental effect on those who visit the area for rest and recreation, and therefore is incompatible with tourism and recreational interests as described in SPP6 Annex A 4 Tourism and Recreational Interests.
- The Scottish Government Report "The economic impacts of wind farms on Scottish tourism" acknowledges that windfarm development in Caithness negatively affects tourism albeit by a small percentage. This report excluded Durran Windfarm from its database. The inclusion of Durran Windfarm, logically, will increase that small negative percentage. Any negative trend in tourism is contrary to Scottish Government ambition to increase tourism by 50% by 2015.
- The proposed development would be highly visible from the arterial routes into Thurso most of which are used by tourists and visitors alike.
- It will be detrimental to the livelihood of local owners of caravan parks, holiday cottages and bed & breakfasts. People come here for the vast open landscape and unspoilt views.

Ecology

- There are a number of RSPB Schedule 1 – Part 1, highly protected species, including Greylag goose, Greenland White-fronted goose, Pink-footed goose, Whooper Swan, Hen Harrier, Short Eared Owls, breeding Waders, breeding Ospreys and Barn Owl. The proposed site is directly in flight lines for migrating birds arriving for Loch Scarmclate Ramsar site, but the EIA does not show these correctly. The surrounding farm land provides feeding areas for the birds who roost on Loch Scarmclate and those that fly from St. John's Loch to Loch Calder, or from Loch Heilen to Loch Calder. These birds are at high collision risk from this development. There is no mention of Common Crane which have been resident in the area over the last three summers.

- Bats, including Pipistrelle and Horseshoe, have been seen regularly in the area and are known to roost in at least two locations very close to the turbines, but again the EIA conveniently does not show this. Bats are protected by European law under the Habitats Directive (92/43/EEC). Recent studies have shown bats to be extremely vulnerable to changes in air pressure caused by turbines' rotating blades which results in fatal internal haemorrhaging, as has been well documented by surveys of wind farms in America and elsewhere. Thousands are known to die each year.

Geology, Hydrology and Hydrogeology

- Turbines 1, 2, 3, and 7 have been assessed as having a relatively high potential to cause erosion to the mires/bogs habitats and with turbines nos: 8, 10, 11 and 13 a potential to pollute with alkaline sediments.
- Any sediment run-off from the construction of Turbines 1, 2, and 3 has the potential to pollute Achingills Burn and thence the River Thurso Special Area of Conservation. Turbines 4, 5, 6, 7, 9 and 12 have the potential to pollute the Burn of Durran which leads to the Loch of Durran – a Site of Special Scientific Interest (SSSI).
- Turbines 8, 10, 11 and 13 have the potential to pollute Quoynee Burn which could in turn pollute Loch Scarmclate (SSSI) and Loch Watten.
- Construction of three turbines on peat may be dangerous and unstable.

Noise, Shadow Flicker, Distance to Occupied Houses, Safety and Effects on Human Health

- The proposed turbines are within 1km of occupied housing which is far too close from the point of view of safety and effects upon human health. Highland Council's own guidelines (both previous planning guidelines and recommendations in the 2006 Renewable Energy Strategy) recommend a minimum distance to occupied housing of 1000m. Scottish Executive's Planning Policy SPP6 recommends that turbines should not be situated closer than 2km from communities. This development is contrary to both SPP6 and Highland Council's own planning guidelines and recommendations.
- Shadow Flicker is an intolerable phenomenon occurring at window openings, causing distress and health problems.
- Constant exposure to noise (audible and subsonic) is known to seriously affect human health. Flicker factor and strobe effects of the blades can also cause adverse health effects and can affect sufferers of epilepsy.
- The surrounding area has livestock and horses which could be easily frightened by the turbines and cause serious injury to the owners or walkers.
- Turbines are located close to local roads, the nearest being 500m away. Safety to drivers and driver distraction is a potential hazard.
- There are numerous houses located within 2km of the proposed development. This development would have a significant long-term detrimental impact on the amenity of people living nearby.

Please acknowledge receipt of this objection in writing

*Please complete the form and send it by letter post to **The 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.