Planning Application : Strathy South, Sutherland

Proposal Description	This application by Scottish and Southern Energy is for 77 turbines - 110 metres to the tip (360 ft), 80 metres diameter rotor, and 70m tower - and includes access tracks, temporary borrow pits, anemometer masts, a control building, switching station and underground cabling. Access to the site will be off the A836, 5 km south of Strathy.
Planning Application Reference	07/00263/S36SU
Deadline for Objections	**10th August 2007**

Use the following form to submit an objection by post.

Objection form

Name (Required in capitals)	
Address (Required)	
Town (Required)	
Postcode (Required)	
Email	

Planning Application	Consent to construct and operate a wind power station at Strathy South, Sutherland
Planning Application ref:	07/00263/S36SU

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.

Planning

☐ This development is contrary to the 2006 Highland Renewable Energy Strategy, in that it is in an area specifically presumed against development.

☐ This development is contrary to the Highland Structure Plan which states that "The qualities of wild land are a material consideration in evaluating development proposals on or affecting it."

☐ This development is contrary to Highland Council Planning Policy T6 concerning the protection of scenic views, including those "…from tourist routes and viewpoints."

☐ This development is contrary to Highland Council Planning Policy L4, concerning the maintenance and enhancement of the landscape character. It states that *"The Council will have regard to the desirability of maintaining and enhancing present landscape character in the consideration of development proposals".*

☐ This proposed development is contrary to Highland Council Structure Plan G1 in that it will not promote or enhance the social and environmental wellbeing of the local people.

☐ This development is contrary to the Tongue and Farr Local Plan (1995) Policy 1.50, Policy 1.56 and Policy 1.66

☐ This development is contrary to the North West Sutherland Local Plan (1987) Policy 2.31, concerning the safeguarding of designated areas, specifically SSSIs, from development. It states that *"these areas will be safeguarded from development."*

☐ This development is contrary to the South and East Sutherland Local Plan (2000), Strategic Policy 17 – Environment, which states *that "The Council will…safeguard and enhance the natural and cultural environment throughout South and East Sutherland"* including by *"safeguarding statutorily designated natural heritage sites", "protecting the integrity of national and open landscape designations or areas"*, and *"safeguarding essential open spaces".*

Grid Connection

☐ This application does **not** include a future off-site grid connection by National Grid. Turbines would be connected from a sub-station in Strathy South forest by underground cable 12 km to connect to the existing Beauly to Dounreay 275kV tower line near the Strath Halladale to Forsinard A897, through the Flow Country, further desecrating the Sutherland and Caithness Peatlands. This does not include the 6km underground cable from Strathy South forest, which is part of a separate application.

Landscape and Visual Amenity

☐ The proposed development lies in an area of Great Landscape Value, and its approval would have a highly significant and detrimental impact on the landscape character and value of a very wide surrounding area.

- ☐ The proposed development will impact visually on numerous points over a wide area, extending along Strathnaver, Strathhalladale, the north coastal tourist route and settled coastal strip, and on all of the local (and some distant) peaks including Ben Hope, Ben Loyal, Ben Griam Begg, and Ben Klibreck. The visual and landscape impacts would be significantly detrimental and contrary to Policy G2 and Policy L4 in the Highland Structure Plan.

- ☐ The ES significantly underplays the affect of these turbines on the landscape. We believe that the overall affect would be "**Substantially adverse**" overall, creating a notable and significant change in the wild land characteristics.

Cumulative Effect

- ☐ There are 33 wind power station sites approved or at planning within Caithness and Sutherland. That says much about the existing density of these developments in this part of the country. The cumulative effect is already substantial throughout Caithness and south-east Sutherland and will simply expand into north-west Sutherland if this development is approved. We already have enough – no more turbines are needed in this area.

Ecology

- ☐ This development will be in the midst of the Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and RAMSAR site. These protected areas of international importance include such habitats as active blanket bog and rare wetland plants and animals. The development includes an access track to be built across the SAC between the Strathy South and North wind power stations and a widening of the access road to the site again encroaching onto the SAC. Along with the potential for damage to the SAC during construction, these encroachments may well affect its integrity and thereby breach the European Habitats Directive.

- ☐ Otter is protected by a raft of European and national legislation with the European sub-species being listed as globally threatened. It is a cited interest of the Caithness and Sutherland Peatlands SAC, a UK Biodiversity Action Plan (BAP) species and a Sutherland Local Biodiversity Action Plan (LBAP) priority species. The Strathy South site is home to a population of Otter considered to be of international importance. There is a significant threat to this priority species by the development of this wind power station.

- ☐ Pine Marten is listed on Appendix III of the Bern Convention and is protected by national legislation. It is a UK BAP species of conservation concern and a Sutherland LBAP priority species. The Strathy South site is home to a population of Pine Marten considered to be of national importance. There is a significant threat to this priority species by the development of this wind power station.

- ☐ Water Vole is now thought to be one of the fastest declining mammal species in Britain with northern Scotland being one of the last refuges. It has limited protection in law but is a UK BAP priority species and is listed on the Scottish Biodiversity list. Studies suggest that several groups of Water Vole maintain territories in the Strathy South site and are considered to be of national importance. There is a significant threat to this priority species by the development of this wind power station.

- Wildcat is now rare and found only in the northern half of Scotland. It is under severe threat from various causes including habitat loss and fragmentation. It is protected by a raft of European and national legislation, is listed on the Scottish Biodiversity list, is a UK BAP priority species and a Sutherland LBAP priority species. The Environmental Statement acknowledges that, although no signs of Wildcat presence were found during studies, it is possible that Wildcat do use the Strathy South site occasionally for shelter and foraging and are therefore considered to be of national importance. Construction of this wind power station may well have an adverse effect on this species through disturbance and loss of suitable habitat.

- The River Strathy and the Yellowbog Burn run adjacent to the site. The Yellowbog Burn and its tributaries join the Strathy to the north of the site. The Strathy is described by the Scottish Environment Protection Agency (SEPA) as a 'pristine catchment' and contains Atlantic Salmon, Brown Trout and Eel. Atlantic Salmon is listed on Annex IIa of the EC Habitats Directive, is a UK BAP species of conservation concern and a priority species on the Scottish Biodiversity list. The Strathy and its tributaries are suitable spawning areas for Salmon and Trout and anecdotal evidence suggests widespread useage of the catchment by these species. There is a significant threat of pollution to these watercourses and their spawning beds, especially during construction, from chemicals, run-off and sedimentation. This may well have the additional adverse effect of damage to the Otter population's foraging area and Water Vole habitat.

- No assessment has been considered of the leaching of alkaline from over 40,000 tonnes of concrete from the turbine bases into the local waterways.

Birds

- A wind power station of this magnitude, both in area and height, and taken in conjunction with the adjacent and applied for 35 turbine wind power station at Strathy North, cannot fail to have a serious and maybe devastating impact on the bird life of the area, many species of which are protected by European and National legislation.

- During surveys 72 species of birds were identified. These included 12 listed in Annex 1 of the European Birds Directive, 16 listed in Schedule 1 of the Wildlife and Countryside Act 1981 including Whooper Swan, White-tailed Eagle, Osprey, Fieldfare, Redwing, Red-backed Shrike, Brambling, Common Crossbill and Snow Bunting, 10 red listed and 30 amber listed species of conservation concern.

- The development will be sited in the midst of the Caithness and Sutherland Peatlands Special Protection Area (SPA). Qualifying bird species of the SPA found to be breeding in the area were Golden Eagle, Hen Harrier, Red-Throated Diver, Merlin, European Golden Plover, Dunlin and Common Greenshank. Other qualifying species recorded were Peregrine Falcon and Black-throated Diver. This development is likely to have a serious adverse impact on these birds and therefore, the integrity of the SPA.

- Of concern is the effect on raptors which are particularly vulnerable to collision with rotor blades. Hen Harrier and Golden Eagle, Scotland's national bird, were the most recorded raptors, with Golden Eagle recorded in nearly every month of the year. In the case of Golden Eagle the SPA has a known breeding population of five pairs, two of which nest nearby.

Carbon dioxide and peat

- ☐ Caithness and Sutherland Peatlands are the best eco-system, carbon and methane sink in the world, twice as good as all the forests of Britain, France and Germany combined. It has been discovered recently by some research at Durham University, that the whole of Britain's peatlands, the majority being here in the North of Scotland, store the equivalent of Britain's output of CO_2 for the last 21 years. That is the combined output of all power stations, all transport, commercial and domestic uses that you can think of. It follows therefore that if our peatlands are damaged, they release that CO_2. If they are properly managed they will continue to absorb and mitigate our output of not only CO_2 but also methane, which is 10 times worse than CO_2. Our peatlands must be saved.

- ☐ Payback time for CO_2 released from peat during construction has been vastly underestimated, and fails to use a precautionary approach.

Geology, Hydrology and Peat

- ☐ This area forms part of the Caithness and Sutherland Peatlands, one of the largest and most intact known areas of blanket bog in the world, which should not be destroyed. Peat depths vary from 0.1 to 5 metres. It dries out at excavations for turbine foundations, tracks and ditching and is likely to turn into dry heath. It is physically impossible to restore it once it is so seriously damaged.

- ☐ This site is within a conifer plantation which is in an area of blanket bog. It is already reduced to modified blanket bog and peaty soils and is on a layer of impermeable Precambrian rock. When trees are felled, this puts slopes at risk due to the cracking and dehydration caused by the tree roots, destabilising the slopes, causing a risk of peat slide or peat instability, especially if dry weather is followed by very wet weather. The ES identifies 11 areas at risk, saying that modifying measures will be taken but not explaining properly what measures. There are at least six turbines, T2, T38, T61, T65 and T67 which should be omitted.

- ☐ The hydrology of the site will be affected, and will affect the whole of the catchment area of a number of lochans and upland streams feeding into the River Strathy and the Yellow Bog Burn. These water courses are flashy with high peaks flows and rapid response rates during storms. This was borne out by the recent serious flooding at Dalhalvaig and the whole area was reported to be flooded, which would put a lot of this site at risk, especially the tracks. This would put an appalling strain on Strathy North watercourses, which also share the River Strathy, should this wind power station also go ahead.

- ☐ There will be an increase in silt, a risk of blocking watercourses and smothering fauna and flora with dust and debris particularly during the construction period. There will be permanent scarring of the ground next to the Borrow Pits, i.e. new local quarries.

Archaeology

- ☐ The Strathnaver trail is close to the proposed development and turbines would be visible from many of the locations along that trail. Although these turbines would not disturb the remains, they will disturb the unique settings of the remaining clearance village settlements along the trail. Current and future generations will not be able to enjoy the tranquillity and serenity of these preserved monuments as they were intended.

Socio-economic Issues

☐ Income from climbers, walkers, fishers, shooters and tourists in the area is likely to drop dramatically due to visibility of the turbines over a vast area. Potential visitors may prefer to participate in these activities elsewhere in unspoiled surroundings.

☐ Employment and local economic benefits from continued operation of the area without the wind power station far outweigh any employment or economic benefits following its installation.

☐ Any Community Benefit offered by the developers is unlikely to outweigh the catastrophic losses to the area in terms of lost income from tourism, walkers, climbers etc. and of local job losses.

Roads and traffic

☐ Transport of turbine components weighing up to 130 tonnes between Scrabster and Baligill and then across peat to the proposed site has been omitted in the environmental statement as has the impact of these shipments on local traffic

☐ Transportation of over 600 very slow moving and extremely large heavy loads, weighing up to 130 tonnes, over 24m long and over 4m wide from Scrabster to Baligill, on a daily basis for six months, is likely to cause traffic chaos for over 30km and is completely unacceptable.

Privacy

☐ I do not wish my details to be published on the Scottish Government website.

All representations received will be published on the Scottish Government website unless you request otherwise. Please select this paragraph if you do NOT want your details published.

Please acknowledge receipt of this objection in writing

Please complete the form and send it by letter post to Scottish Government, Energy Consents, 4th Floor, Atlantic Quay, 150 Broomielaw, GLASGOW G2 8LU with a copy 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.