

Planning Application : Halsary Forest, near Spittal, Caithness

Proposal Description Construction of a wind farm containing 18 wind turbines, 58.8 metres to hub and 100 metres to blade tip. Two site accesses from the A9 road and one access from the B870 road to the north, internal refit of Halsary Farm building and change of use from residential to office (control building), removal of forestry.

Planning Application 09/00399/ FULCA
Reference

Deadline for Objections **22 January 2010**

Use the following form to submit an objection

Objection form

Name (Required)

Address (Required)

Town (Required)

Postcode (Required)

Planning Application Consent to construct and operate a wind farm at
Halsary Forest, near Spittal, Caithness

Planning Application ref: 09/00399/ 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.

Communities

- The proposal would have a significant long-term detrimental impact on the amenity of people living nearby and is therefore contrary to the provisions of NPPG6 and SPP6 in this respect.

Dr Stuart Black wrote in a letter to Stop Highland Windfarms Campaign: "I agree with you that development that is judged to have significant long-term detrimental impacts on communities or individual householders for that matter should not be granted. Indeed, this is a fundamental aspect of the Council's current planning policy."

Cumulative impact

- Let us not repeat the same mistake as the Causeymire windfarm where 4 turbines are too close to the A9, causing disorientation, especially approaching them round the bend travelling north. Turbines 8, 12, 15 and 16 of Halsary windfarm would also be too close to the A9 but on the opposite side of the road from the Causeymire windfarm and would distract whether travelling north or south round the same bend. The experience of approaching and driving through the combined developments would be one of oppression.
- Figure 2.1 'Local Cumulative Developments' shows only too clearly the devastating effect should Spittal and Halsary be added to the existing wind farm at Causeymire. This is over provision on a massive scale and would be an intolerable situation for the residents of Spittal.
- From the A99 North of Wick along the stretch from the Staxigoe Junction and out past Tesco, the windfarms at Achairn and Bilbster are prominent with the Causeymire Windfarm frequently clearly visible in the distance beyond Bilbster. When Camster Windfarm is constructed it, seen along with Achairn, will become the dominant feature in the landscape but there will be a separation between that grouping and the Bilbster/Causeymire grouping. If Halsary were to be constructed, there would be an unbroken array of turbines on the horizon from Camster to Bilbster, occupying 30 degrees of the view.

- From the A9 Southwards entering Spittal, there would be an unbroken array of turbines from Camster to Causeymire with Buolfruich visible over the Causeymire turbines, occupying 80 degrees of the view forward. Bilbster is visible to the left of this grouping.

From the A9 travelling northwards Buolfruich Windfarm is visible at Dunbeath and again shortly after leaving Latheron Wheel. It remains prominent until it is passed, before which Causeymire turbines come into view and remain in view until leaving Spittal. North of Rangag, the Halsary turbines will appear as a huge extension to Causeymire, further extending the windfarm experience on the journey North.

From the East and north east, the experience of the Causeymire Windfarm would be extended and its density intensified by seeing Halsary turbines through and beyond the Causeymire Windfarm.

Approaching Mybster on the minor Road from Watten, Causeymire is already an industrial intrusion on the views to Morven with turbines and pylons mingling on the skyline. Halsary would complete the industrialisation of the landscape seen from this direction.

- The current level of windfarms constructed in central Caithness is tolerable. Camster will add considerably to the windfarm experience and it could be argued that its construction will verge on the creation of a landscape dominated by windfarms. Halsary would close over open views seen between existing and consented developments and the creation of a truly windfarm-dominated landscape would be completed.

Halsary Windfarm should be rejected on grounds of unacceptable Cumulative Visual Impact.

Geology and Hydrology

- Areas immediately adjacent to Causeymire wind farm and to the proposed Halsary wind farms include the following conservation designations: Caithness and Sutherland Peatlands Special Area of Conservation (SAC), Shielton Peatlands Site of Special Scientific Interest (SSSI), Caithness and Sutherland Peatlands Special Protection Area (SPA) and RAMSAR site.

A Special wet moorland site is overplanted with forestry and major changes occur to the upper layers of peat and by increasingly deep cracking in the lower layers. This leads to more drying out which de-stabilises the peat beds.

This is exacerbated by the felling of trees, the construction of access tracks, cable tracks, increased ditching, huge turbine bases and the infrastructure which is all part of wind farms.

- Our peatlands are the best eco-system in the world and we destroy them at our peril. They are the best source of natural carbon sink so it is ironic to be destroying them with wind farms. They represent a massive area of peat destruction with the resulting loss of CO₂ from the atmosphere.

The Environmental Statement (ES) states "Depth probing indicates that approximately 95% of the land surface within the development site comprises peat."

The deeper the peat the greater the carbon storage capacity. The peat on this site varies between .01m to over 7.7m in depth. The ES states that the maximum length of probe was 7.9m, so the total depth of peat is unknown in much of the development site and it is further stated that those marked as 6m depth of peat are actually of unknown depth. In other words the peat is enormously deep and so it is impossible to calculate how much CO₂ storage will be destroyed. It could be that this will negate building the wind farm in the first place.

- Peatlands absorb water and release it slowly which helps to prevent flooding at lower levels and is more than ever necessary with our climate becoming increasingly wet.
- It is stated that the in situ peat will be a major issue to overcome. There is no doubt that any construction, especially heavy turbine bases, will be enormously difficult and this in an area where tree roots will have damaged the surface structure of the peat.
- The hydrology of the area is already upset by the ditching for the plantation and will be further adversely affected by the construction of a wind farm which may put the whole structure of the peat at risk. Runoff must be carefully controlled. Pollution of watercourses must be prevented with adequate pollution measures.

Tourism

- The combination of Halsary, Spittal and Causeymire windfarms on one of the main tourist routes in Caithness would give a very unfavourable impression. Visitors will not return if they see a formerly open and unspoilt landscape turned into a massive industrial site.

The unacceptable cumulative visual impact of Halsary Windfarm in combination with existing and consented developments would have a significantly negative influence on tourists resulting in fewer return visits and the lowering of Caithness' attractiveness to future visitors.

Ornithology

- The wind farm site will be adjacent to the Caithness and Sutherlands Peatlands SPA and Ramsar site and the Shielton Peatlands SSSI. The qualifying species of birds for the SPA are Red-throated diver, Black-throated diver, Wigeon, Common scoter, Hen harrier, Golden eagle, Merlin, Golden plover, Dunlin, Wood sandpiper, Greenshank and Short-eared owl. Non-qualifying interests are North Scottish Greylag goose, Teal, Curlew and Arctic skua. The Shielton Peatlands SSSI citation lists breeding waders and wildfowl.
- Raptors recorded during surveys were Hen harrier, Merlin, Peregrine, Goshawk, Rough legged buzzard and Barn owl. During the breeding season Barn owl and Red-throated divers were recorded breeding within 1km of the development and Merlin were presumed to have bred within 700m of the development in both 2008 and 2009. Other birds recorded during the breeding season were Arctic skua, Great skua, Greylag geese, Greenshank, Golden plover, Curlew, Lapwing, Skylark and Twite. Lesser redpoll, Song thrush and Skylark were recorded during the non-breeding season. At least 10 Red grouse territories were recorded during 2008.
- The surveys showed regular use of the Loch of Toftingall for foraging Osprey during the breeding season. The bird would often fly over the site to perch on a fence post where it would consume its catch. Collision modeling shows a potential loss of 1 bird every 5.3 years. This is totally unacceptable. Caithness only supports one pair of breeding Osprey, the most northerly breeding pair in Great Britain. Should the lost bird be the foraging male partner this would likely result in the loss of the offspring that year and present the possibility of there being no breeding pair thereafter. Therefore, the conclusions of the Environmental Statement seriously underestimate the effect on the Osprey population and distribution. Black throated and Red throated divers were also recorded using the Loch of Toftingall for loafing. This shows that the Loch of Toftingall is particularly important to all of these Annex 1 protected birds and the development would pose an unacceptable risk.

Ecology

- There are populations of Water Vole, a UK Biodiversity Action Plan (BAP) priority species in severe decline, on the Halsary Burn and its tributary Hector's Burn. Under the Wildlife and Countryside Act it is an offence to intentionally or recklessly damage, destroy or obstruct access to any structure or place which water voles use for shelter or protection, or to disturb water voles while they are using such a place.
- Otter, which is protected by the EC Habitats Directive and a Priority species in the UK BAP, is recorded as regularly occurring and a viable population uses the Development site.
- Wildcat is protected by the EC Habitats Directive and is likely to occur within the forest area which will be felled if this proposal is approved. The removal of this potential habitat will impose yet another restriction on an already rare and vulnerable species.

- The following are covered by the UK BAP and described in the ES as important at Halsary for their fragility, typicalness, position in the ecological mosaic and potential ecological value: modified bog, dry dwarf shrub heath, upland flush. In addition Valley mires, a type of active blanket bog, is present and is a Priority Habitat under Annex 1 of the EC Directive 92/43/EEC on the Conservation of Natural Habitats and Wildlife Fauna (The Habitats Directive). It is also a Priority Habitat on the UK BAP. It is important at Halsary for its fragility, typicalness and position in the ecological mosaic
- Small cranberry *Vaccinium microcarpum* and *Sphagnum austinii* are Nationally scarce species and confirmed as being present in the site.
- The examples of blanket bog within the Development site are relatively small but are important on account of their diversity, rarity, fragility, typicalness and position in the ecological mosaic. In addition, the 'quality' of the more intact blanket bog within the Development site is similar to the surrounding SAC designated blanket bog.

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.