

## Planning Application : Spittal Hill Wind Farm

**Proposal Description**                      The application by Spittal Hill Wind Farm Ltd. is for the construction of a wind farm comprising 30 turbines, total rated capacity of 75 MW, with a maximum height of 110 metres (360.8 feet) and rotor diameter of 80 metres (262.4 feet), and includes 12.9 km (8 miles) of access tracks, cabling, substation, 2 permanent anemometer masts and temporary contractors compound. Access to the site will be via the A882 and unclassified road past Dunn or via the A99 and A9 onto an existing track north of Spittal. It is anticipated that the grid connection will be via underground cable to the Mybster substation.

**Planning Application Reference**                      Spittal Hill Wind Farm, Caithness

Use the following form to submit an objection

### Objection form

Name (Required in capitals)

Address (Required)

Town (Required)

Postcode (Required)


**Planning Application**                      Consent to construct and operate a wind farm at Spittal Hill, Caithness

**Planning Application ref:**                      Spittal Hill Wind Farm, Caithness

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.

### **Residential Amenity**

- Scottish Planning Policy 6 Annex A Section 4 Communities states –

*“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”.*

This statement is unequivocal. Unlike elsewhere in the policy, it does not open a possibility of compromise.

A recent clarification from Minister Jim Mather’s office states –

*“The 2km separation distance is intended to recognise that, in relation to local communities, visual impacts are likely to be a prominent feature and this should be taken into account when identifying the most suitable search areas. However, impacts will clearly vary considerably depending on the scale of projects and the proposed location. That is why SPP6 confirms that, in all instances, proposals should not be permitted if they would have a significant long-term detrimental impact on the amenity of people living nearby. This principle applies to houses within and outwith 2km of the proposed development and regardless of whether they are single dwellings or part of a settlement.”*

Spittal wind farm will have a significant long-term detrimental impact, which cannot be mitigated, on the amenity of the numerous residents living nearby. The number, height and movement of the turbines together with their siting on a hill in a wide-open landscape with no natural features to shield or disguise, combine to make a wind farm of overwhelming and dominating presence. In fact, it will be omnipresent to the numerous residents impacted upon by this development and will be a blight on their lives. The closest home is between 800 and 900 metres and the village of Spittal is approximately 1300 metres from the closest turbine **not** 2 km as stated in the ES. To infer, as does the ES, that a wind farm of this magnitude merely introduces another layer of human activity, is quite frankly ludicrous.

This is contrary to Scottish Planning Policy 6, Policies G1,G2 and G3 of the Highland Structure Plan and PP3 of the Local Plan.

## **Landscape and Visual Impact**

- Spittal Hill is a centrally located 176 metre high isolated hill in a landscape of open character and is a local landmark. Whilst not high, its form is simple, uncluttered and unspoilt and its setting is typical of what makes the landscape of Caithness unique.

The development is for 30 turbines up to 110 metres in height, the site occupying 980 hectares (over 2421 acres or 3.75 square miles). The highest turbine will tower over the summit by approximately 59 metres (193 feet). This combination will diminish and destroy the natural form of the hill, detrimentally alter the landscape character and produce a wind farm of overwhelming and dominating visual impact.

Indeed, the Environmental Statement admits it will be visible from all points of the compass. Significant visual effects apply to over 50% of surrounding areas. Only a few pockets of land are shown as not having sight of the wind farm. No mitigation is offered, nor indeed is possible, for a development of this size in such a prominent location.

Scottish Natural Heritage has objected to this development on landscape and visual impacts.

The landscape and visual impact is contrary to Policies E2, G2 and L4 of the Highland Structure Plan.

## **Cumulative Impact**

- Caithness already has 48 operational wind turbines with another 28 consented but not yet built. For those travelling along the A9 (the main tourist route into and out of Caithness) there is already a succession of turbines plainly in view and when the Camster wind farm is built this will add to the perception of an area at saturation point. If this development were to be approved, it will be the wind farm that tips the balance from what is already a 'landscape with wind farms' to that of a 'wind farm landscape'. It would also add a disproportionate cumulative effect due to its position on a hill in the centre of the county. To change the landscape of an area, which is renowned for its unique wide-open vistas and big skies, so significantly cannot be justified.

Scottish Natural Heritage has objected to this development on cumulative impacts.

This is contrary to Policies E2 and L4 of the Highland Structure Plan.

## **Noise, Shadow Flicker and Health Issues**

- For the residents surrounding the development the noise implications will be severely detrimental, both during the construction period, which will last for 18 months, and during the lifetime of the wind farm. This is 25 years with the likelihood of extension. Add to this the possibility of turbines being micro-sited up to 50 metres closer to residences and the situation will be intolerable. There is now well-documented evidence of human health being severely impacted upon by the noise from wind farms and residents unable to live in their homes any more. A study by Nina Pierpont (2009) relates that subject's symptoms were not present before turbine operation and they were resolved once exposure ceased. Symptoms include sleep disturbance, tinnitus, migraines, headaches, motion sickness, dizziness, palpitations, stress anxiety, depression and problems with memory and concentration. The ETSU-R-97 guidance used and quoted by wind farm developers was based on 27 metre high turbines, a fraction of the size of those intended for this development, and is now considered by some to be out of date. Clinicians and experts such as Pierpont and The Noise Association are recommending a minimum distance of 2km from residences to turbines.

Shadow flicker is an intolerable phenomenon and can be very distressing. The shadow flicker zone for this development is shown to include The Cottage at North Dunn, for which there have not been any calculations provided in the Environmental Statement, the consented property at Upper Larel, the majority of the unclassified road at Dunn, a small part of the B870 and more disturbingly the A882 at Lower Dunn. There is also the added uncertainty of turbines being micro-sited up to 50 metres closer to these properties and roads. Whilst mitigation is offered in the form of turbine shutdown this is just another example of the development being sited much too close to homes.

This is contrary to Scottish Planning Policy 6, policies G1,G2,G3 and E2 of the Highland Structure Plan and PP3 of the Local Plan.

## **Tourism and Socio-Economic Impact**

- Tourism is the main industry in the Highlands and with the decommissioning of Dounreay the tourist industry will become ever more important to the already fragile economy of Caithness. Any negative effects on the tourist trade are, therefore, to be avoided. Tourists visit Caithness for its unique landscape of wide-open spaces and big skies, for its wildlife, natural heritage assets and coastline. They do not visit to see wind farms. They will not want to come to a visitor centre surrounded by wind farms and likely to be subject to noise pollution from this development. Any jobs created by the wind farm will be far outweighed by the negative impact on the tourist trade and its associated industries. It is short sighted and naïve to believe that a wind farm of this immense size, which will impact on all of Caithness and is situated next to the main tourist route in and out of the county, will not detrimentally affect the one group of people that Caithness needs to encourage. They may come once, but may never return.

This is contrary to Policy G1 of the Highland Structure Plan

## Highland Renewable Energy Strategy

- Highland Council's Renewable Energy Strategy defines the site area as having a presumption against major national scale wind farms. Highland Council therefore, has already judged the site on its merits and found it to be unsuitable. If consent was given to this application the whole process of public consultation and the Highland Renewable Energy Strategy would be rendered worthless.

## Transport and Access

- The Environmental Statement states 9638 additional vehicle transports, including 4862 HGV transports and a further 432 abnormal loads will take place over the 18 month construction period. Abnormal loads average two per day and will cause significant disruption to the traffic flow along routes to the site and in particular in Wick as they manoeuvre round the town. They are scheduled to occur outwith normal working hours in order to minimise traffic disruption. This may well cause significant disturbance to residents along the routes during sleep time periods and impact on the emergency services. The unclassified road at Dunn and the route from the Bower quarry, where concrete will be sourced, to the site will be greatly impacted upon, with residents living adjacent to these routes subjected to noise, vibration, dust and potential access problems for 18 months. This will cause a significant and detrimental impact on their residential amenity throughout the construction phase.

This is contrary to Scottish Planning Policy 6, Policies E2 and G2 of the Highland Structure Plan and PP3 of the Local Plan.

## Cultural Heritage

- Caithness is rich in archaeological and historical sites most of which are undisturbed and of great value. The Environmental Statement details 21 Scheduled Ancient Monuments (SAMs) within 5 kms of the site whilst 126 SAMs, 16 Grade A, 77 Grade B and 59 Grade C Listed Buildings lie within the ZTV area. Two SAMs lie close to the site, Spittal Farm Broch at approximately 500 metres from the nearest turbine and the Chapel of Dunn at approximately 1000 metres.

Historic Scotland's response to the initial application was to advise the removal or relocation of four turbines to lessen the impact on these two nationally important sites. This advice appears to have been ignored, as the site layout remains the same.

Historical events that leave no trace, such as battles, are known to have occurred on Spittal Hill. There is clearly a need for primary identification of archaeological sites due to the lack of previous systematic archaeological fieldwork in this area, and because of the number of sites of national importance close to the wind farm site. This is complicated by the fact that archaeological sites that survive below ground cannot be identified by desk-based assessment or walk over survey alone, as has been performed by the developers.

The development will clearly have adverse impacts on cultural heritage grounds, which are contrary to Policy G2 of the Highland Structure Plan.

## Ecology

- The ES shows a strong otter population of regional importance to be present on the site. Otter is a rare and internationally important species with the European subspecies being listed as globally threatened, and is protected by European law under the Habitats Directive (92/43/EEC). The wind farm construction phase would render the otter population unacceptably vulnerable because otters' ranges are very extensive, they breed throughout the year and the young remain in the holt for two months.

Local knowledge indicates a strong presence of bats in the area of the wind farm site. Bats are protected by European law under the Habitats Directive (92/43/EEC). Insufficient survey work has been undertaken to assess the impact this development will have on these mammals. Only a sample of buildings was checked for signs of bats and the population has not been assessed through emergence or flight activity surveys. Studies done in America, Europe and Canada indicate thousands of bats' deaths yearly from collisions with moving turbine blades and barotrauma. The developers state that, although they have no robust means to predict frequency of bat collisions, there will be no significant effects. Water Vole is a UK Biodiversity Action Plan priority species, which is in severe decline, though Caithness still maintains a population. The developers identify suitable habitats in a number of locations on the site. A thorough survey should be undertaken for this important species. Additionally, surveys have not been conducted for the presence of Pine Marten and Wild Cat, both rare and vulnerable species.

The proposed site contains areas of two peatland habitats, both protected by European law under the Habitats Directive (92/43/EEC), and classified under the Northern Atlantic Wet Heaths with Erica Tetralix category and the European Dry Heaths category. Areas of abundant Dactylorhiza Orchid are present along with fragments of blanket bog vegetation, which is indicative of deeper peat. These habitats could be destroyed, damaged or polluted during construction.

## **Ornithology**

- Spittal wind farm will be within 2.5 km of Loch Scarmclate and 2 km of Loch Watten, which are component parts of the Caithness Lochs Special Protection Area (SPA) and Ramsar site. During the annual migration periods two of the cited species of the SPA, Annex 1 protected Whooper swans and Greylag geese constantly move between feeding areas and roost sites on and surrounding Spittal Hill, including the wind farm site. These birds also fly at night. This development will have a serious adverse impact on these birds and therefore, the integrity of the SPA.

This development will be sited in one of the foraging flight paths of the most northerly nesting Osprey in Great Britain. Ospreys are protected under Annex 1 of the European Birds Directive. The wind farm would render this magnificent bird especially vulnerable.

Spittal Hill is an important area for Hen Harriers for winter foraging. Other Annex 1 species known to be present at the site are Short-eared owl, Merlin and Golden Plover. Long-eared owls, Barn owls and Tawny owls have been seen nearby. Curlew, Snipe, Lapwing, Oystercatcher, Skylark and Meadow Pipit nest on the hill. Other bird species recorded in the Environmental Statement included Wigeon, Teal, Buzzard, Kestrel, Swallow, Reed Bunting, Cuckoo, Stonechat, Willow Warbler and Raven.

Hérons from the nearby heronry use the hill for foraging and often fly across the wind farm site to fish in the River Thurso and Loch Toftingall. They fly very low and cannot manoeuvre very quickly. These birds would be especially vulnerable to collision with moving turbine blades. This may well affect the viability of the heronry, believed to be the only active site in Caithness.

The bird survey data submitted with the original application is flawed. The site of the wind farm changed between 2004 and 2006. The Environmental Statement admits that some of the original vantage points may have interfered with bird behaviour patterns and data collected is, therefore, unsound. In addition other vantage points did not overlook the final site location. It is clear that insufficient survey work has been completed for the proposal.

## **Hydrology**

- The wind farm site is covered with drainage channels and burns ultimately running in to Lochs Toftingall, Scarmclate and Watten and the River Thurso. This is confirmed by the fact that there are to be 26 water crossing constructions on the site. Loch Watten is classified under the European Habitats Directive as an Annex 1 priority habitat and also supports a high quality Brown Trout fishery. Loch Scarmclate is also a Brown Trout fishery, a site of Special Scientific Interest and is the only shallow geotrophic marl loch in Caithness. Burns running into these lochs are spawning grounds for Brown Trout. There is a significant threat of pollution and damage to these watercourses during the construction of the wind farm from chemicals, run-off and sedimentation. This may well have the additional adverse effect of damage to the Otter population's foraging area.

## **Geology**

- The geology underlying the site comprises Middle Old Red Sandstone of the Upper Caithness Flagstone Group (Spittal Subgroup of Caithness) deposited 360 million years ago, close to the western margin of an extensive shallow lake. Two quarries on the site, Banniskirk and Spittal, are classified as Sites of Special Scientific Interest for their finds of fossil fish. It is unlikely that the quarries are the only locations on the hill of such fossils.

## **Public Consultation and Response**

- The application for a wind farm on Spittal Hill was submitted to the Scottish Government in April 2007. At that time the developers acknowledged plans for a wind farm on Spittal Hill for more than 10 years, yet it was not until June 2006 that any attempt was made to engage the local community. This took the form of:
  1. A questionnaire designed to elicit favorable responses, sent out to local residents using an out of date mailing list and containing photomontages of barely visible turbines. Results of the questionnaire have not been included in the ES.
  2. An exhibition in Watten village hall, advertised in the above questionnaire, but only once in the local paper on the same day as the event.
  3. A seminar in Spittal village hall to an invited audience. Residents living closest to the proposal were not invited.
  4. A website.

The Addendum submission shows the number, height and layout of the turbines to be identical to the original application.

Public consultation means truly engaging with, listening to and acting upon the genuine concerns of the local community. This could and should have been done from the outset. Instead, the community was told what the development would be and is still being told. Nothing has changed. The many concerns of local residents, expressed before the application submission and as representations to the Scottish Government at the Application stage, have not been addressed. In fact they have been ignored.

So far there have been over 1000 objections to this development, the vast majority from local people, showing by far the biggest negative reaction to any wind farm development in Caithness. In addition, Watten Community Council held a postal ballot. A very good response rate to the ballot showed an overwhelming majority against the development.

It is to be hoped that the local community will not be ignored by the Scottish Government.

This development is contrary to Scottish Planning Policy 6 because there has been inadequate public consultation.

## **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 Unit, 4th Floor, 5 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 wind farm.***